

IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. CROIX

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IN RE:        RED DUST CLAIMS        ) MASTER CASE NO. SX-15-CV-620  
  ) COMPLEX LITIGATION DIVISION  
\_\_\_\_\_  
  )

**MOTION OF DEFENDANTS ALCOA INC. N/K/A ARCONIC INC. AND  
ST. CROIX ALUMINA, LLC’S TO EXTEND DEADLINE  
FOR SUBMITTING JOINT DISCOVERY PLAN**

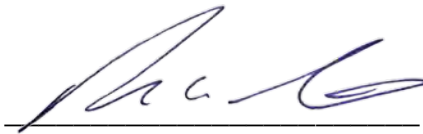
Defendants Glencore Ltd., Alcoa Inc. n/k/a Arconic Inc. and St. Croix Alumina, LLC move to extend the deadline for the parties to meet and confer and submit their joint discovery plan for the reasons set forth below. Undersigned counsel is authorized to represent to the Court that Defendants Glencore and St. Croix Renaissance Group join in this motion.

In preparing to meet for purposes of arriving at a discovery plan that all parties can agree upon, Plaintiffs prepared and submitted a proposed discovery plan to the Defendants. Defendants conferred as a group and presented Plaintiffs with an alternative discovery plan, based largely upon the plan they submitted to the Court a year ago, but incorporating the Court’s latest guidance given at the January 2019 status conference. Plaintiffs’ counsel has been in trial for the past week and that trial has continued this week. Consequently, the parties have not had

the opportunity to meet and discuss their competing plans to see if they can arrive at a joint plan to submit to the Court. Thus, Defendants seek a 14-day extension (until March 5, 2019) to meet and confer with Plaintiffs' counsel and then submit either a joint discovery plan or the competing plans.

February 19, 2019

Respectfully Submitted,



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**Certificate of Service**

I hereby certify that this document complies with the font and page limitations of V.I.Civ.P.R. 6-1(e) and that on February 19, 2019, I served a copy of the foregoing by email, as agreed by the parties, on:

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