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March 20, 2009

VIA FACISMILE (856) 757-5296
AND UNITED STATES MAIL

The Honorable Ann Marie Donio
Magistrate Judge
United States District Court,
District of New Jersey
Michael H. Cohen Building & U.S. Courthouse
One John F. Gerry Plaza
Camden, NJ 08101-2797

Re: Masha Allen, by her Parent and Guardian Faith Allen v. Family Thru
International Adoption, Inc., Child Promise, Inc. (formerly known as Reaching
Out Thru International Adoption, Inc.), Reaching Out Thru International
Adoption, Inc., and Jeannene Smith
United States District Court, District of New Jersey; Docket No. 08 CV 4614
(JHR)

Dear Judge Donio:

Although I am not counsel of record in the above-referenced action nor admitted to practice in the United States District Court for the District of New Jersey, I am Plaintiff Masha Allen's personal attorney and am respectfully submitting this letter on her behalf. (I am admitted to practice in the United States District Court for the Northern District of Georgia, the United States District Court for the Middle District of Georgia, the United States Court of Appeals for the Eleventh Circuit and the United States Court of Appeals for the Fourth Circuit.)

Presently pending before the Court is a Motion of Counsel for Plaintiff for Leave to Withdraw filed by attorney Robert N. Hunn and the law firm of Kolsby Gordon Robin Shore & Bezar. As correctly indicated in supporting pleadings, Plaintiff Masha Allen, acting by her adoptive mother, Faith Allen, opposes the Motion. (Counsel for Plaintiffs' Brief in Support of Motion to Withdraw as Counsel for the Plaintiffs, pp. 4-5).

At this time, efforts are being made to secure counsel for the purpose of a special, limited appearance on behalf of solely with respect to the Motion. Such counsel has not, however, as yet been retained.

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In my capacity as the personal attorney of the minor Plaintiff, I do not believe it is in her interest to file a pro se pleading in response to the Motion or to be effectively unrepresented with respect to further proceedings in connection with the Motion.

Accordingly, the purpose of this letter is to request a fifteen day extension, through and including Tuesday, April 7, 2009, of the time in which a Response to the pending Motion may properly be filed. In this regard, I have been authorized to advise the Court that Mr. Hunn and his firm do not object to this request.

Thank you for your consideration of this request.

Respectfully yours,

DAVID S. BILLS, P.C.



David S. Bills

DSB/bt

cc: Robert N. Hunn, Esq.
Donald C. Kofsky, Esq.
Jeannene Smith