

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

BARBARA ANN WILSON,

)

)

) **2:10-cv-02386-KOB**

Plaintiff,

)

)

v.

)

) **OPPOSED**

THE BIRMINGHAM PUBLIC

)

LIBRARY FOUNDATION; et al.,

)

)

Defendants.

)

PLAINTIFF’S MOTION FOR EXTENSION

The Plaintiff, through undersigned counsel, files this Motion respectfully requesting entry of an Order extending the date by which she must respond to Defendants’ Motion to for Summary Judgment by seven days. As grounds for this motion, the Plaintiff states the following:

1. Plaintiff’s response to Defendants’ Motion for Summary Judgment is presently due August 10, 2011.
2. The undersigned, a solo practitioner and Plaintiff’s sole counsel, has several conflicts the same week Plaintiff’s response is due including an appellate brief deadline and an out of town administrative bench trial.
3. The conflicts described above prevent the undersigned from adequately preparing and filing Plaintiff’s response by the present deadline.

4. No party would be prejudiced by an Order granting this Motion.
5. An Order granting this Motion would cause no undue delay in the adjudication of this case.
6. Counsel for the Defendants' has represented to the undersigned that his clients oppose this Motion.

Wherefore, the Plaintiff respectfully requests entry of an Order extending the date by which she must file her response in opposition to the Defendants' Motion for Summary Judgment by seven days or until Wednesday, August 17, 2011.

Respectfully submitted,

s/Adam P. Morel

Adam P. Morel

ATTORNEY FOR PLAINTIFF

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above has been served on all counsel of record via electronic filing.

This the 2nd day of August, 2011.

s/Adam P. Morel

OF COUNSEL