

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

<b>JONES DAY,</b>	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 06 CV 00466 (JR)
	)	
<b>RICHARD M. SCRUSHY,</b>	)	
	)	
Defendant.	)	

**CONSENT MOTION FOR EXTENSION OF TIME**

Plaintiff Jones Day, through counsel, and with the consent of defendant’s counsel, hereby moves to extend the time for Jones Day to respond to the Motion to Dismiss filed by defendant Richard M. Scrushy (“Scrushy”) in this matter on May 8, 2006. In support of this motion, Jones Day states as follows:

1. Jones Day currently is required to respond to the Motion to Dismiss by May 19, 2006.
2. Counsel for the parties have conferred and counsel for Scrushy has consented to an extension of the time for Jones Day to respond.
3. The parties have agreed to a revised schedule in which Jones Day will file its opposition to the Motion to Dismiss by June 8, 2006, and Scrushy will file his reply brief in support of the Motion to Dismiss by June 22, 2006.

WHEREFORE, for the reasons set forth herein, and for such further reasons as may appear to the Court, Jones Day requests that the Court grant the relief requested herein.

Respectfully submitted,

/s/

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