

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

MAXINE WRIGHT

Plaintiff,

v.

VERIZON COMMUNICATIONS INC.

Defendant.

Civil Action No. 1:06-cv-01819-HHK

**DEFENDANT'S CONSENT MOTION TO EXTEND TIME TO RESPOND TO
PLAINTIFF'S AMENDED COMPLAINT**

Defendant Verizon Communications Inc., by agreement with plaintiff through plaintiff's mediation counsel, respectfully requests the Court to extend defendant's time to answer or otherwise respond to plaintiff's Amended Complaint (dkt. 21) until September 7, 2007.

1. Plaintiff filed her *pro se* Amended Complaint on December 13, 2006. (Dkt. 21.) Defendant moved to dismiss on December 21, 2006. (Dkt. 25.) The Court denied the motion to dismiss on August 10, 2007. (Dkt. 45.) Absent an extension, Fed. R. Civ. P. 12(a)(4)(A) requires defendant to answer or otherwise respond to the Amended Complaint by August 24, 2007.

2. The undersigned counsel has recently inherited primary responsibility for this case from another attorney at Covington & Burling LLP. Counsel accordingly requires additional time to review plaintiff's pleadings and to prepare an informed response to plaintiff's allegations.

3. The Court's August 10, 2007 Order recognized the complexity presented by plaintiff's *pro se* allegations, stating that the Court "is endeavoring to appoint counsel for [plaintiff] who may be able to better articulate her grievances in a future submission." (Dkt. 45

at 2 n.1.) An extension of the response period will therefore also allow the Court additional time to locate and appoint litigation counsel for plaintiff.

4. Plaintiff, through her mediation counsel, Anne Gbenjo, Esq., consents to defendant's motion for a 14-day extension.

Accordingly, defendant requests that the Court extend defendant's time to answer or otherwise respond to plaintiff's Amended Complaint (dkt. 21) for a period of 14 days, until September 7, 2007.

Respectfully submitted,

/s/ Frederick G. Sandstrom
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*Attorney for Defendant Verizon
Communications Inc.*

August 21, 2007

CERTIFICATE OF SERVICE

I certify that on August 21, 2007, I served true and correct copies of the foregoing Consent Motion to Extend Time to Respond to Plaintiff's Amended Complaint on the following individuals:

Ms. Maxine Wright
5721 Magnolia Lane
Falls Church, VA 22041
Plaintiff (pro se)
By Certified Mail

Anne Gbenjo, Esq.
The Gbenjo Law Group
8449 W. Bellfort Ave., Suite 100
Houston, TX 77071
Plaintiff's Mediation Counsel
By Federal Express

/s/ Frederick G. Sandstrom