

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

<b>NATHANIEL DANIELS</b>	:	
<b>2513 North Rosedale Street</b>	:	
<b>Baltimore, MD 21216</b>	:	
	:	<b>Civil Action No.: 05-2455 (GK)</b>
<b>Plaintiff,</b>	:	
	:	
<b>BRUCE R. JAMES, PUBLIC PRINTER</b>	:	
<b>U.S. Government Printing Office</b>	:	
<b>732 North Capitol Street, N.W.</b>	:	
<b>Washington, D.C. 20401</b>	:	
	:	
<b>Defendant.</b>	:	

**PLAINTIFF’S MOTION FOR AN ENLARGEMENT OF TIME  
TO FILE RESPONSE TO DEFENDANT’S MOTION  
FOR SUMMARY JUDGMENT**

Comes now the Plaintiff, by and through his attorney, Donald S. Johnson, Sr., and respectfully moves the Court, pursuant to Fed. R. Civ. P. 6, for an enlargement of time, until the 15<sup>th</sup> day of September 2007, within which to file his response to the Defendant’s Motion for Summary Judgment. Plaintiff has brought this action under Title VII of the Civil Rights Act of 1964, as amended 42 U.S.C. § 2000(e) *et seq.*, and the Age Discrimination in Employment Act of 1967 (ADEA), as amended, 29 U.S.C. § 621 *et seq.* As grounds for this motion, the following is respectfully represented:

1. Counsel for the Plaintiff has been physically ill since before January 2007.
2. Counsel had surgery on July 11, 2007 and has been convalescing at home for the past month.
3. Counsel is a solo practitioner with occasional assistance of part time employees which includes the occasional aid of his son, who is an attorney licensed only in Maryland, but who is not engaged in the active practice of law.

4. Although Counsel has been able to handle a few minor matters during this time, I have been unable to fully meet the demands of my law practice due in part to the prescribed medications for pain and recovery.

5. Counsel has made no prior requests for continuance.

6. Counsel for the Plaintiff has been contacted pursuant to LCvR 7(m) but has not returned the call prior to the filing of this motion.

**POINTS AND AUTHORITIES**

1. The record herein.
2. The powers of this Court.
3. District Court Rules of Civil Procedure.

**WHEREFORE**, Counsel respectfully requests that the Court grant an extension of time until September 15<sup>th</sup>, 2007.

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Donald S. Johnson, Sr.  
Attorney for the Defendant  
Bar Number 372774  
P.O. Box 4703  
Capital Heights, Maryland 20791  
(301) 808-6770