

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

SHANTE MOORE,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.05-2020
)	
)	
THE DISTRICT OF COLUMBIA, <i>et al.</i> ,)	
)	
Defendants.)	

**THE DEFENDANTS ELDORADO MILLS
AND THE DISTRICT OF COLUMBIA’S
PARTIAL CONSENT MOTION TO ENLARGE THE TIME IN WHICH
TO FILE THEIR REPLY TO PLAINTIFF’S OPPOSITION
TO THE DEFENDANTS’ MOTION FOR SUMMARY JUDGMENT**

Defendants Eldorado Mills and the District of Columbia (collectively “District defendants”), by and through undersigned counsel, hereby move this court to enlarge the time to file their reply an additional ten (10) days. As reasons why this motion should be granted, these District defendants state the following:

1. By order of this court dated August 20, 2007, these District defendants are to file their reply brief to plaintiff’s opposition to the defendants’ motion for summary judgment on or before September 11, 2007. Plaintiff filed their opposition to the defendants’ motion on August 29, 2007. In the interim period, the undersigned has had numerous depositions in other matters. As a result of the time requirements for these depositions, the District defendants have been unable to complete their reply brief and require an additional ten (10) days to do so. These defendants, therefore, seek an enlargement until September 25, 2007, in which to file their reply brief.

2. Under Fed. R. Civ. P. 6(b) provides that,

“[w]hen by these rules or by a notice given thereunder or by order of court an act is required or allowed to be done within a specified time, the court... may in its discretion (1) with or without motion or notice order the period enlarged if request therefore is made before the expiration of the period previously prescribed...”

3. This motion is being made prior to the expiration of the prescribed period, is for good cause shown, and does not unduly prejudice plaintiffs.

WHEREFORE, the District defendants hereby move this Court to grant their motion to enlarge the time to reply to plaintiff’s opposition to objections.

Respectfully submitted,

LINDA SINGER
Attorney General for the District of Columbia

GEORGE C. VALENTINE
Deputy Attorney General, D.C.
Civil Litigation Division

/s/ Phillip A. Lattimore, III
PHILLIP A. LATTIMORE, III [422968]
Chief, General Litigation Section III
Civil Litigation Division

/s/ George E. Rickman
GEORGE E. RICKMAN #433298
Assistant Attorney General, D.C.
General Litigation Section IV
Civil Litigation Division
441 Fourth Street, Sixth Floor South
Washington, D.C. 20001
202-442-9840; 202-727-6295

Local Rule 7(m) Certification

I do hereby certify that on September 10, 2007, the undersigned contacted Donna Rucker, Esq., counsel for plaintiff, in an effort to obtain her consent to the relief sought herein. Ms. Rucker indicated that she consents to a seven (7) day extension but opposes a ten day extension.

/s/George E. Rickman
GEORGE E. RICKMAN
Assistant Attorney General, D.C.

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**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF
THE DEFEDANTS ELDORADO MILLS DISTRICT OF COLUMBIA’S
PARTIAL CONSENT MOTION TO ENLARGE THE TIME IN WHICH
TO FILE THEIR REPLY TO PLAINTIFF’S OPPOSITION
TO THE DEFENDANTS’ MOTION FOR SUMMARY JUDGMENT**

As support and authority for the District defendants’ motion to enlarge the time in which to file their reply, these District defendants cite to and rely on the following:

1. Fed. R. Civ. P. 6(b)(1);
2. The record herein;
3. The equitable powers of the Court;
4. In the interest of justice and judicial economy;
5. Plaintiff’s partial consent.

Respectfully submitted,

LINDA SINGER
Attorney General for the District of Columbia

GEORGE C. VALENTINE
Deputy Attorney General, D.C.
Civil Litigation Division

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