

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

ANNE PEARSE-HOCKER,)	
)	
Plaintiff,)	
)	
v.)	Case No. 10-269C
)	Judge Edward J. Damich
UNITED STATES)	
)	
Defendant.)	
)	

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
OPPOSITION TO GOVERNMENT'S MOTION FOR PARTIAL SUMMARY
JUDGMENT**

Plaintiff, Anne Pearse-Hocker, by and through her undersigned counsel, pursuant to Rule 6 of the Rules of the Court of Federal Claims and to Paragraph 4 of the Court's Special Procedures Order [Dkt. 21], hereby moves for a 10-day extension of time until January 27, 2011, to file her opposition to the Government's motion for partial summary judgment [Dkt. 25]. In support of her motion, Plaintiff avers as follows:

1. Pursuant to the Court's December 7, 2010 scheduling order, Plaintiff's opposition brief to the Government's motion for partial summary judgment on Plaintiff's breach of contract claim is due on January 17, 2011.

2. Since the preliminary status conference held on December 7, 2010, the parties have significantly narrowed the gulf between their proposals for settlement of this case and continue to engage in regular, active discussions regarding settlement of all claims in this case.

3. Plaintiff anticipates that the parties may be able to reach agreement on the terms for settlement of this case by January 27, 2011. Plaintiff anticipates that postponing the due date for Plaintiff's opposition brief by 10 days would permit the parties to exhaust their settlement

discussions and determine whether a settlement may be reached without Plaintiff being forced to incur the potentially unnecessary expense of preparing an opposition brief to the Government's motion for partial summary judgment.

4. Plaintiff would agree to a corresponding extension of the deadline for the government's reply brief from January 31, 2011, to February 9, 2011. Further, because fact discovery is not scheduled to commence until February 1, 2011, no other deadlines would need to be modified.

5. Counsel for the Government advises that the Government does not oppose the instant motion or the relief requested herein.

WHEREFORE, Plaintiff, Anne Pearse-Hocker, respectfully requests that the Court grant her unopposed motion and extend the deadline for her opposition brief to the Government's motion for partial summary judgment to January 27, 2011, and that the Court similarly extend the deadline for the Government's reply brief to February 9, 2011.

Respectfully submitted,

THOMPSON HINE LLP

Dated: November 10, 2010

By: /s/ Eric Heyer

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Counsel for Plaintiff Anne Pearse-Hocker

CERTIFICATE OF SERVICE

I, Eric Heyer, hereby certify that on this 11th day of January, 2011, I will cause a true and correct copy of the foregoing Plaintiff's Unopposed Motion for Extension of Time to File Opposition to Government's Motion for Partial Summary Judgment to be served via the Court's ECM/ECF system on the following:

Walter W. Brown
United States Department of Justice

Attorney for the United States

/s/ Eric Heyer