

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

ORLY TAITZ,

Plaintiff,

v.

CAROLYN COLVIN, COMMISSIONER
SOCIAL SECURITY ADMINISTRATION

Defendant.

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Civil No. ELH-13-1878

MOTION FOR EXTENSION OF TIME

The Defendant, the United States of America, respectfully moves for an extension of time within which to file its Reply Brief in the captioned case and for cause states:

1. On August 21, 2013, The Plaintiff filed its Opposition (Docket 9) to the Government's Motion to Dismiss. (Docket 7).

2. Therefore, the Government's Reply Brief is due within fourteen days (14) days of the filing of the Plaintiff's Opposition, which means it must be filed on or before September 4. Local Rule 105.2(a).

3. Undersigned counsel believes that the Government will need additional time to prepare, draft and finalize its Reply Brief. Unfortunately, the filing deadline in this case coincides with several other pre-existing deadlines in which the undersigned attorney is counsel for the Government. Therefore, it is respectfully requested that the Court grant this Motion and allow the Government an additional twelve (12) days in which to file its Reply Brief. If the Court grants this Motion, the Government's Reply Brief will be due on or before September 16.

4. The Plaintiff in this case is proceeding *pro se* and therefore, the Government has not contacted her to inquire about her position regarding the relief sought by this Motion.

However, it is respectfully contended that the extension of time sought herein will not prejudice or cause harm to the Plaintiff.

WHEREFORE, Defendant respectfully requests that it be given until September 16, 2013 to file its Reply Brief in this case. A proposed Order is attached hereto.

Respectfully submitted,

ROD J. ROSENSTEIN
United States Attorney

By: /s/
Andrew G. W. Norman
Assistant United States Attorney
Federal Bar No. 00242
36 S. Charles Street, 4th Floor
Baltimore, Maryland 21201
Telephone: (410) 209-4800

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of August 2013, a copy of the foregoing *Motion for Enlargement of Time and Proposed Order* was sent, first class mail, postage prepaid, to:

Orly Taitz
29839 Santa Margarita Parkway, Suite 100
Rancho Santa Margarita, California 92688

pro se Plaintiff

/s/
Andrew G.W. Norman
Assistant United States Attorney

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CAROLYN COLVIN, COMMISSIONER
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ORDER

Upon consideration of the Defendant's Motion for Extension of Time and there being good cause therefore, it is

ORDERED that the time for the Defendant to file its Reply Brief in the captioned case BE and the SAME HEREBY IS extended through and including September 16, 2013.

Dated: _____

ELLEN L. HOLLANDER
United States District Judge

Motions

1:13-cv-01878-ELH Orly Taitz v. Colvin

U.S. District Court

District of Maryland

Notice of Electronic Filing

The following transaction was entered by Norman, Andrew on 8/23/2013 at 10:17 AM EDT and filed on 8/23/2013

Case Name: Orly Taitz v. Colvin

Case Number: 1:13-cv-01878-ELH

Filer: Carolyn Colvin

Document Number: 10

Docket Text:

MOTION for Extension of Time by Carolyn Colvin Responses due by 9/9/2013 (Attachments: # (1) Text of Proposed Order)(Norman, Andrew)

1:13-cv-01878-ELH Notice has been electronically mailed to:

Andrew George Norman andrew.norman@usdoj.gov, Charlene.smith2@usdoj.gov, Donna.Knight@usdoj.gov

1:13-cv-01878-ELH Notice will not be electronically delivered to:

Orly Taitz
29839 Santa Margarita Parkway
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Rancho Santa Margarita, CA 92688

The following document(s) are associated with this transaction:

Document description:Main Document

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[STAMP dcecfStamp_ID=1046883720 [Date=8/23/2013] [FileNumber=4637655-0]
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d9774285df3c261f166288b0496ca7eb9153cb5ad8d244b7e3350f3f7cef2]]

Document description:Text of Proposed Order

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[STAMP dcecfStamp_ID=1046883720 [Date=8/23/2013] [FileNumber=4637655-1]
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