

IN THE COURT OF COMMON PLEAS
FRANKLIN COUNTY

ROBERT J. FITRAKIS,	:	
	:	
Plaintiff,	:	Case No. 12CV013888
	:	
v.	:	Judge Mark A. Serrott
	:	
OHIO SECRETARY OF STATE	:	
JON HUSTED, et al.	:	
	:	
Defendants.	:	

MOTION OF DEFENDANT SECRETARY OF STATE JON HUSTED FOR A ONE WEEK EXTENSION OF TIME TO FILE A REPLY TO PLAINTIFF FITRAKIS'S MEMORANDUM IN OPPOSITION TO MOTION TO DISMISS

Defendant Secretary of State Jon Husted hereby requests a one week extension of time to file his reply to Plaintiff Fittrakis's Memorandum in Opposition to Motion to Dismiss. Although the service date reflected in Plaintiff's Memorandum indicates that Plaintiff filed his memorandum in opposition on February 22, 2013, Defendant did not actually receive a copy of the filing until February 23, 2013 by operation of the court's electronic filing notification. Given the delay in receiving Plaintiff's filing and the various other matters that counsel has needed to attend to, a one week extension is necessary to permit Defendant to finalize his reply. Secretary Husted asks this Court for an extension until March 8 to file his reply brief. Defense counsel contacted Plaintiff's counsel to obtain consent, but has not yet received a response.

Respectfully submitted,

MIKE DEWINE
Ohio Attorney General

/s/ Richard N. Coglianesse

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*Counsel for Defendant
Secretary of State Jon Husted*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing *Motion of Defendant Secretary of State Jon Husted For A One-Week Extension Of Time To File A Reply To Fitrakis's Memorandum In Opposition To Motion To Dismiss* was filed electronically on February 28, 2013. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

/s/ Richard N. Coglianesse

Richard N. Coglianesse (0066830)
Assistant Attorney General