

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

THE NORTHEAST OHIO COALITION FOR :
THE HOMELESS and :

SERVICE EMPLOYEES :
INTERNATIONAL UNION, LOCAL 1199, :

Plaintiffs, :

v. :

JENNIFER BRUNNER, :
OHIO SECRETARY OF STATE, :

Defendant. :

Case No. 2:06-cv-896
JUDGE MARBLEY

THE NORTHEAST OHIO COALITION FOR :
THE HOMELESS and :

SERVICE EMPLOYEES :
INTERNATIONAL UNION, LOCAL 1199, :

Plaintiffs, :

v. :

THE STATE OF OHIO, :

Intervenor-Defendant. :

DEFENDANT SECRETARY OF STATE JENNIFER BRUNNER'S
MOTION FOR EXTENSION OF TIME

Defendant Secretary of State Jennifer Brunner respectfully moves this Court for an Order granting an additional eleven (11) day extension of time by which to file her Memorandum in Opposition to the Combined Motion of Plaintiff the Northeast Ohio Coalition for the Homeless to Enjoin the Ohio Supreme Court's Order in *State ex rel. Skaggs v. Brunner* and Renewed

Motion to Enforce the Judgment. This motion is submitted in good faith and not for the purposes of delay, but merely due to the unavailability of counsel as a result of the holiday season. Moreover, counsel for NEOCH has consented to an extension up to fourteen (14) days. Therefore, Defendant respectfully requests that this Court grant an eleven (11) day extension, thereby extending the responsive deadline from January 5, 2009 to Friday, January 16, 2009.

Respectfully submitted,

NANCY H. ROGERS
OHIO ATTORNEY GENERAL

/s Aaron D. Epstein

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed electronically on this 30th day of December, 2008. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

/s/ Aaron D. Epstein _____