

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
AIKEN DIVISION**

STATE OF SOUTH CAROLINA,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:16-00391-JMC
)	
UNITED STATES;)	
)	
UNITED STATES DEPARTMENT OF)	
ENERGY;)	
)	
DR. ERNEST MONIZ, in his official capacity as)	
Secretary of Energy;)	
)	
NATIONAL NUCLEAR SECURITY)	
ADMINISTRATION; and)	
)	
LT. GENERAL FRANK G. KLOTZ,)	
in his official capacity as Administrator of the)	
National Nuclear Security Administration and)	
Undersecretary for Nuclear Security;)	
)	
Defendants.)	
_____)	

JOINT MOTION FOR EXTENSION OF TIME

Counsel for the Plaintiff and the Defendants, pursuant to Local Civil Rule 6.01, jointly move this Court for an order extending the time for Defendants to file a response to Plaintiff’s Motion for Reconsideration (ECF No. 62), which was due Thursday, December 15, 2016, by one (1) day until Friday, December 16, 2016, and extending the time for Plaintiff to file a reply to Defendants’ response to Plaintiff’s Motion for Reconsideration, which would be due Tuesday, December 27, 2016, by seventeen (17) days until Friday, January 13, 2017.

Defendants seek additional time because both Civil Division attorneys assigned to the case were unexpectedly out of the office due to medical emergencies in their families. Civil Division

counsel forwarded the government's opposition after 10 p.m. on December 15, 2016, and the filing could not be timely made.

Plaintiff seeks additional time because of the upcoming Christmas and New Year's holidays and because Plaintiff's counsel has several personal and work scheduling conflicts, which require counsel to be out of the office from December 22, 2016, through January 3, 2017. This is Plaintiff's first request for an extension in which to reply to Defendants' response to Plaintiff's Motion for Reconsideration.

This joint extension request would not affect any other deadlines in this matter.

Accordingly, the parties jointly request the Court for an order extending the time for Defendants to file a response to Plaintiff's Motion for Reconsideration by one (1) day until Friday, December 16, 2016, and extending the time for Plaintiff to file a reply to Defendants' response to Plaintiff's Motion for Reconsideration by seventeen (17) days until Friday, January 13, 2017.

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Respectfully submitted,

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December 16, 2016
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