

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA**  
**Civil Division**

**Estate of ROBERT E. WONE, by  
KATHERINE E. WONE,**

**Plaintiff,**

**v.**

**JOSEPH R. PRICE,**

**VICTOR ZABORSKY,**

**and**

**DYLAN WARD,**

**Defendants.**

**Civil Action No. 0008315-08**

**The Honorable Brook Hedge**

**Next Event: December 15, 2010**

**Exchange Witness Lists/Deadline**

**For Discovery Requests**

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**CONSENT MOTION TO EXTEND TIME TO RESPOND TO PLAINTIFF'S  
MOTION TO COMPEL PRODUCTION OF THIRD-PARTY DOCUMENTS**

Defendant Joseph R. Price, by undersigned counsel, hereby moves, with consent of Plaintiff, for an extension of time to respond to Plaintiff's Motion to Compel Production of Third-Party Documents and in support, states:

1. On or about September 14, 2010, Plaintiff filed a Motion to Compel Production of Third-Party Documents Withheld by Defendant Price with respect to a third-party subpoena that Plaintiff had earlier issued to Arent Fox, LLP, a law firm in which Mr. Price was formerly a partner.
2. Both before and since the filing of Plaintiff's underlying Motion, Plaintiff and Defendant Price have been in communication regarding a possible compromise to the issues raised in the Motion, and the Parties are making progress in that regard.

3. Accordingly, the Parties request that Defendant Price be given a brief extension of time to respond to Plaintiff's Motion to Compel, to Monday, October 4, 2010, so that the Parties can continue working toward a compromise.

4. Counsel for the Plaintiff, Benjamin Razi, has consented to this request for extension of time.

5. Justice requires the requested relief.

**WHEREFORE**, Defendant Joseph Price respectfully requests that this Honorable Court extend the time for his responding to Plaintiff's Motion to Compel to Monday, October 4, 2010, and for such other relief as is deemed appropriate.

Respectfully submitted,

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**Attorneys for Defendant Joseph Price**

**STATEMENT OF POINTS AND AUTHORITIES**

D.C. Superior Court Civ. Rule 6(b)  
D.C. Superior Court Civ. Rule 12-I(a)  
D.C. Superior Court Civ. Rule 12-I(e)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 28<sup>th</sup> day of September, 2010, a copy of the foregoing Consent Motion to Extend Time to Respond to Plaintiff's Motion to Compel Production of Third-Party Documents, Statement of Points and Authorities, and proposed Order were served via this Court's electronic case filing system on the following counsel of record:

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/s/Brett Buckwalter  
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