

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA**

**Civil Division**

Estate of ROBERT E. WONE, by  
KATHERINE E. WONE,  
as Personal Representative,

*Plaintiff,*

v.

JOSEPH R. PRICE,  
VICTOR J. ZABORSKY,  
and DYLAN M. WARD,

*Defendants.*

Civil Action No. 008315-08

The Honorable Brook Hedge

Next Court Event: February 14, 2011  
Deadline for Discovery Requests

**PLAINTIFF'S CONSENT MOTION FOR TWO-DAY EXTENSION  
OF TIME TO RESPOND TO DEFENDANTS' MOTION TO DISMISS  
COUNTS ONE, THREE, AND FOUR, OR IN THE ALTERNATIVE, MOTION FOR  
PARTIAL SUMMARY JUDGMENT**

Plaintiff Estate of Robert E. Wone, by Katherine E. Wone as personal representative, through undersigned counsel, hereby moves with consent of all Defendants for a two-day extension of time to respond to Defendants' Joint Motion To Dismiss Counts One, Three, and Four, or in the alternative, Motion for Partial Summary Judgment. In support of this motion, Plaintiff states:

1. On or about October 5, 2010, Defendants filed a Motion to Dismiss three counts of Plaintiff's Complaint, or in the alternative, for Summary Judgment with respect to those counts.

2. Under D.C. Superior Court Rules of Civil Procedure 6 and 12-I, Plaintiff's opposition to that motion would be due on October 20, 2010.

3. In order to address fully each of the arguments advanced in Defendants' motion, Plaintiff requests a very brief extension of two days to file its opposition brief.

4. Plaintiff has sought and received consent from all Defendants, through their counsel, to extend the deadline for filing Plaintiff's opposition by two days to October 22, 2010.

5. The brief extension sought by Plaintiff will not affect any other deadlines in the case.

**WHEREFORE**, Plaintiff Estate of Robert E. Wone respectfully requests that this Court extend the time for its response to Defendants' Joint Motion to Friday, October 22, 2010.

Respectfully submitted,

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October 20, 2010

*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 20, 2010, I caused a copy of the foregoing  
Consent Motion to Extend Time to be served via CaseFileXpress on the following counsel:

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\_\_\_\_\_  
/s/ Brett C. Reynolds

Brett C. Reynolds

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**ORDER**

Upon consideration of Plaintiff Estate of Robert E. Wone's Consent Motion for Two Day Extension of Time to Respond to Defendants' Joint Motion to Dismiss or for Partial Summary Judgment, it is on this \_\_\_\_ day of October, 2010, by the Superior Court of the District of Columbia, hereby:

ORDERED that Plaintiff's Consent Motion is GRANTED, and is further

ORDERED that Plaintiff's response to Defendants' Joint Motion to Dismiss or for Partial Summary Judgment shall be filed on or before Friday, October 22, 2010.

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JUDGE BROOK HEDGE