

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**ORLY TAITZ,**

**Plaintiff,**

**v.**

**CAROLYN COLVIN, COMMISSIONER  
SOCIAL SECURITY ADMINISTRATION**

**Defendant.**

)  
)  
)  
)  
)  
)  
)  
)  
)  
)  
)

**Civil No. ELH-13-1878**

**MOTION FOR EXTENSION OF TIME**

The Defendant, the United States of America, respectfully moves for an extension of time within which to file its Reply Brief in the captioned case and for cause states:

1. On August 21, 2013, The Plaintiff filed its Opposition (Docket 9) to the Government's Motion to Dismiss. (Docket 7).

2. Therefore, the Government's Reply Brief is due within fourteen days (14) days of the filing of the Plaintiff's Opposition, which means it must be filed on or before September 4. Local Rule 105.2(a).

3. Undersigned counsel believes that the Government will need additional time to prepare, draft and finalize its Reply Brief. Unfortunately, the filing deadline in this case coincides with several other pre-existing deadlines in which the undersigned attorney is counsel for the Government. Therefore, it is respectfully requested that the Court grant this Motion and allow the Government an additional twelve (12) days in which to file its Reply Brief. If the Court grants this Motion, the Government's Reply Brief will be due on or before September 16.

4. The Plaintiff in this case is proceeding *pro se* and therefore, the Government has not contacted her to inquire about her position regarding the relief sought by this Motion.

However, it is respectfully contended that the extension of time sought herein will not prejudice or cause harm to the Plaintiff.

WHEREFORE, Defendant respectfully requests that it be given until September 16, 2013 to file its Reply Brief in this case. A proposed Order is attached hereto.

Respectfully submitted,

ROD J. ROSENSTEIN  
United States Attorney

By:         /s/          
Andrew G. W. Norman  
Assistant United States Attorney  
Federal Bar No. 00242  
36 S. Charles Street, 4<sup>th</sup> Floor  
Baltimore, Maryland 21201  
Telephone: (410) 209-4800

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 23<sup>rd</sup> day of August 2013, a copy of the foregoing *Motion for Enlargement of Time and Proposed Order* was sent, first class mail, postage prepaid, to:

Orly Taitz  
29839 Santa Margarita Parkway, Suite 100  
Rancho Santa Margarita, California 92688

*pro se* Plaintiff

\_\_\_\_\_  
/s/  
Andrew G.W. Norman  
Assistant United States Attorney