DISTRICT OF COLUMBIA COURT OF APPEALS

Nos. 04-CM-760, 04-CO-1600

ELENA R. SASSOWER,

Appellant,

ν.

UNITED STATES OF AMERICA,

Appellee.

APPELLEE'S UNOPPOSED MOTION FOR EXTENSION OF TIME WITHIN WHICH TO FILE BRIEF TO JANUARY 27, 2006

Appellee, the United States of America, respectfully moves for an enlargement of time, until January 27, 2006, within which to file its merits brief. In support of this motion, appellee states the following:

- Appellee's merits brief currently is due on December 20,
 2005.
- 2. Undersigned counsel contacted Elena Sassower, appellant pro se, who indicated that she does not oppose appellee's request for an enlargement of time to January 27, 2006, in which to file its brief.
- 3. The undersigned Assistant United States Attorney has an oral argument in the United States Court of Appeals for the District of Columbia Circuit on December 12, 2005, in <u>United States v. Nathaniel Thomas</u>, No. 04-3097; a brief due on December 28, 2005, in the D.C. Circuit, in <u>United States v. Ramon Alberto-Genao</u>, No. 05-3034; an oral argument in this Court on January 5, 2006, in

Janice Washington v. United States, No. 03-CF-852; and an oral argument in this Court on January 11, 2006, in Corey L. Kates v. United States, No. 04-CF-826.

4. Appellee has not previously requested any extensions of time in this matter, and does not anticipate needing any further extensions of time.

WHEREFORE, appellee respectfully requests an enlargement of time in which to file its brief, to and including, January 27th, 2006.

Respectfully submitted,

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Assistant United States Attorney

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing motion for enlargement of time has been mailed to Elena R. Sassower, 16 Lake Street, Apartment 2C, White Plains, NY 10603, this 7th day of December, 2005.

FLORENCE PAN

Assistant United States Attorney