

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**JAMES HANDWORK** )  
Lake Erie Correctional Institution )  
P.O. Box 8000 )  
Conneaut, Ohio 44030 )

Plaintiff, )

v. )

Civil Action No. 1:16-cv-00825  
Judge Solomon Oliver, Jr.

**THE OHIO DEPARTMENT OF** )  
**REHABILITATION AND CORRECTION** )  
777 West Broad St. )  
Columbus, OH 43222 )

and )

**GARY C. MOHR** )  
In his official capacity as Director of Ohio Department )  
of Rehabilitation and Correction )  
777 West Broad St. )  
Columbus, OH 43222 )

Defendants. )

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**UNOPPOSED MOTION TO EXTEND TIME  
FOR PLAINTIFF TO FILE HIS RESPONSE  
TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

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Plaintiff James Handwork, by and through his attorneys, hereby moves this Honorable Court for an Order extending the time for him to file his response to Defendants' Motion for Summary Judgment. In support of this motion, Plaintiff states as follows:

1. Plaintiff filed a complaint against Defendants on April 7, 2016. Defendants filed a Motion

for Summary Judgment on July 28, 2016.

2. Plaintiff opposes Defendants' Motion and will file a Memorandum in Opposition.

According to this Court's Local Rule 7.1(d), an opposing memorandum is due August 29, 2016.

3. Plaintiff's Counsel request an extension of this due date to September 19 because of their current involvement in a highly expedited voting rights case and their upcoming scheduled vacations.

4. Defendants' Counsel does not oppose this Motion to extend the due date to September 19.

**Wherefore** Plaintiff respectfully requests that this Court enter an Order extending the time for him to file his Response to September 19, 2016.

Dated this 1st day of August, 2016.

Respectfully submitted,

s/ Freda J. Levenson  
Freda J. Levenson (0045916)  
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Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

I certify that the foregoing Unopposed Motion to Extend Time for Plaintiff to File his Response to Defendants' Motion for Summary Judgment was electronically filed with the District Court of the Northern District of Ohio on August 1, 2016. The Court's electronic filing system will provide notice of this filing to all parties, and all parties may access this filing through the Court's electronic filing system.

*s/ Freda Levenson*  
Freda Levenson (0045916)  
Trial Attorney for Plaintiff