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## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT EASTERN DIVISION

JAMES HANDWORK	:	CASE No.: 1:16 CV 00825
Plaintiff,	:	JUDGE SOLOMON OLIVER, JR.
<b>V.</b>	:	
THE OHIO DEPARTMENT OF REHABILITATION AND CORRECTION,	:	
et al.	:	
Defendants.	:	

## DEFENDANTS' UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO PLAINTIFF'S REPLIES TO DEFENDANT'S MOTIONS Doc #: 15 & 16

Defendants, by and through undersigned Counsel, here by request an additional three weeks to respond to Plaintiff's Doc #: 15 & 16, Motions for Summary Judgment. Counsel had communicated with Plaintiff's Counsel and in light of a previously agreement to extension for time to file Plaintiff's motion, Counsel has agreed to an extension of Defendants' motion to extend out three weeks. Three weeks from October 3, 2016 is falls on Monday, October 24, 2016.

<u>s/ Freda J. Levenson</u> Freda J. Levenson (0045916) Trial Attorney for Plaintiffs Elizabeth Bonham (0093733) ACLU of Ohio Foundation, Inc. 4506 Chester Ave. Cleveland, OH 44103 Tel: (216) 472-2220 Fax: (216) 472-2210 **Respectfully submitted,** 

## MICHAEL DEWINE (0009181) Ohio Attorney General

<u>/s/ George Horváth</u> GEORGE HORVÁTH (0030466) Assistant Attorney General Office of the Ohio Attorney General Criminal Justice Section Corrections Litigation Unit 150 E. Gay Street, 16<sup>th</sup> Floor Columbus, Ohio 43215 Direct: 614.466.6680 Fax: 866.578.9963 George.Horvath@OhioAttorneyGeneral.gov

Trial Counsel for Defendants

## **CERTIFICATE OF SERVICE**

I certify that I electronically filed with the District Court Clerk copy of the foregoing, *DEFENDANTS' UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO PLAINTIFF'S REPLIES TO DEFENDANT'S MOTIONS Doc #: 15 & 16* on October 3, 2016.

The Court's electronic filing system will provide Notice of this filing all parties. Parties may access this filing through the Court's electronic filing system.

<u>/s/ George Horváth</u> GEORGE HORVÁTH (0030466) Assistant Attorney General