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21 UNITED STATES DISTRICT COURT
22 EASTERN DISTRICT OF WASHINGTON

23 UNITED STATES SMALL
24 BUSINESS ADMINISTRATION
25 and JOVITA CARRANZA, in her
26 capacity as Administrator for the
27 United States Small Business
28 Administration,

Appellants/Cross-Appellees,

v.

ASTRIA HEALTH, et al.,

Appellees/Cross-Appellants.

Case No. 1:20-cv-03089-RMP

UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE
UNITED STATES' REPLY AND
RESPONSE BRIEF



1 The United States, on behalf of the Small Business Administration (“SBA”) and
2 Jovita Carranza in her capacity as Administrator for the SBA, hereby moves for a
3 seven-day extension of its deadline to file its brief in reply to its appeal and response
4 to Astria Health’s cross-appeal (the “Reply and Response” brief). The Reply and
5 Response brief would otherwise be due on November 27, 2020 under Bankruptcy
6 Rule of Procedure 8016.
7

8
9 This is the United States’ first request for extension, Astria Health consents to
10 the extension, and the short extension is supported by good cause. The filing deadline
11 would otherwise fall on the day after the Thanksgiving holiday, when trial counsel for
12 the United States had scheduled to be on leave. The intervening holiday would also
13 make it difficult to coordinate the United States’ response with the SBA absent a short
14 extension.
15
16

17 WHEREFORE, the United States respectfully requests that the Court extend the
18 deadline to file its Reply and Response brief by seven days, so that it is due on
19 December 4, 2020. A proposed order is attached.
20

21 November 20, 2020

Respectfully submitted,

22 JEFFREY B. CLARK
23 Acting Assistant Attorney General
24

25 WILLIAM D. HYSLOP
26 United States Attorney

27 /s/ Kevin P. VanLandingham
28 RUTH A. HARVEY

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Attorneys for the United States

CERTIFICATE OF SERVICE

I hereby certify that on November 20, 2020, I electronically filed the UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE THE UNITED STATES' REPLY AND RESPONSE BRIEF with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants.

/s/ Kevin P. VanLandingham
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15 UNITED STATES DISTRICT COURT
16 EASTERN DISTRICT OF WASHINGTON

17 UNITED STATES SMALL
18 BUSINESS ADMINISTRATION
19 and JOVITA CARRANZA, in her
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22 Administration,

22 Appellants/Cross-Appellees,

23 v.

24 ASTRIA HEALTH, et al.,

26 Appellees/Cross-Appellants.

Case No. 1:20-cv-03089-RMP

[PROPOSED] ORDER GRANTING
UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE
UNITED STATES' REPLY AND
RESPONSE BRIEF

1
2 Upon consideration of the Unopposed Motion for Extension of Time to File the
3 United States' Reply and Response Brief it is hereby

4 ORDERED that the motion is GRANTED.
5

6 It is FURTHER ORDERED that the United States' deadline to file its Reply
7 and Response brief is extended by seven days, so that it is due on December 4, 2020.

8 DATED this ___ day of November, 2020.
9

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11

ROSANNA MALOUF PETERSON
12 UNITED STATES DISTRICT JUDGE

13 Presented by:

14 /s/ Kevin P. VanLandingham
15 KEVIN P. VANLANDINGHAM
16 Trial Attorney
17 Commercial Litigation Branch
18 Civil Division
19 *Attorney for the United States*
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