November 8, 2006

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

DOCKETED USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

November 9, 2006 (9:07am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

In the Matter of)	ADJUDICATIONS STAFF
DAVID GEISEN)) Docket No	o. IA-05-052
)) ASLBP No	o. 06-845-01-EA

JOINT MOTION FOR EXTENSION OF TIME

The parties, by and through their respective counsel, jointly move for a further extension of time to file discovery motions relating to the parties' October 3, 2006 written discovery responses until and including December 1, 2006. The parties have been engaged in good faith discussions regarding discovery issues related to the October 3, 2006 written discovery responses. As a result of various factors relating to this proceeding, the parties have not been able to complete their good faith discussions. The parties expect to continue their good faith discussions and respectfully submit that that a further extension until and including December 1, 2006 would assist the parties in their efforts to resolve or limit the issues that would be the subject of the discovery motions.

Respectfully submitted,

Lisa B. Clark Michael A. Spencer Counsel for NRC Staff

Richard A Hibey Charles F. B. McAleer, Jr. Andrew T. Wise Matthew T. Reinhard Counsel for David Geisen

Dated: November 8, 2006

TEMPLATE = SECY-041

SEW-02

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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CERTIFICATE OF SERVICE

I hereby certify that copies of "JOINT MOTION FOR EXTENSION OF TIME" in the above captioned proceeding have been served on the following persons by deposit in the United States Mail; through deposit in the Nuclear Regulatory Commission internal mail system as indicated by an asterisk (*); and by electronic mail as indicated by a double asterisk (**) on this 8th day of November, 2006.

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