

THE STATE OF NEW JERSEY,
Petitioner,

Docket No. 06-5140

Respondents.

As noted in the Federal Respondents' initial "Motion for Extension of Time, served January 3, 2007, the undersigned is counsel of record in *United States of America v. Able Time, Inc.*, Case No. 06-56033 (9th Cir.), and the Reply Brief of the United States is due on or about February 26, 2007 (Motion for Extension of Time pending). Moreover, the undersigned is also

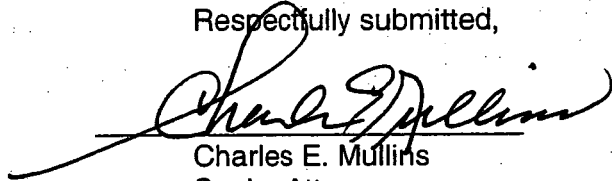
lead counsel in *San Luis Obispo Mothers for Peace, et al. v. NRC*, No. 03-74628 (9th Cir.) (Response to Petitioners' Motion for Attorneys' Fees and Costs Under the Equal Access to Justice Act due on or about March 2, 2007) (Motion for Extension of Time pending), as well as *Eastern Navajo Dine' Against Uranium Mining et al. v. NRC*, No. 07-9505 (10th Cir.) (Filed February 12, 2007). In addition, the undersigned has a full load other duties in the Office of the General Counsel including (but not limited to) review of administrative subpoenas, review of responses to requests under the Freedom of Information Act, and review of and responses to proposed legislation.

As noted above, Kenneth W. Elwell, Esq., counsel for the State of New Jersey, has graciously consented to this request for extension of time.

CONCLUSION

For the foregoing reasons, this Court should grant an extension of time to and including March 20, 2007, for the Federal Respondents to file their Reply to Petitioner's Response to the Federal Respondents' motion to Dismiss.

Respectfully submitted,



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Dated: February 23, 2007.

CERTIFICATE OF SERVICE

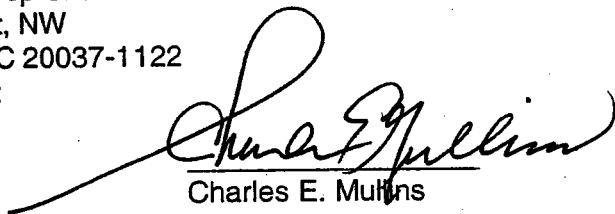
I hereby declare under penalty of perjury that I filed the original and three copies of the original and three copies of the "Federal Respondents' Consented Motion for Extension of Time To Reply to Petitioners' Response to Federal Respondents' Motion to Dismiss" with this Court by placing it in an overnight delivery service, postage prepaid, addressed to this Court.

I further declare under penalty of perjury that I served two copies of the "Federal Respondents' Response to This Court's Order and Motion to Dismiss," and two copies of the "Federal Respondents' Consented Motion for Extension of Time To Respond to Motions to Intervene" on the following counsel by placing the same in an overnight delivery service, postage prepaid:

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Dated: February 23, 2007.