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#### UNITED STATES OF AMERICA NUCLEAR RECULATORY COMMISSION

USHRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD 29 P4:02

In The Matter of:

ADVANCED MEDICAL SYSTEMS, INC.

Byproduct Material License Nong34-1989-01 Docket No. 30-16055-SP ASLBP No. 87-545-01-SP EA-86-155

(Suspension Order)
Date: January 29, 1990

# MOTION FOR EXTENSION OF TIME

Counsel for Advanced Medical Systems, Inc. (AMS) moves this Board for an extension of time to respond to the NRC Staff's Motion for Summary Disposition. Said document, which contains several hundred pages, was not received by Counsel for AMS until January 16, 1990 and is due on or about February 5, 1990. AMS requests a 30-day extension until March 7, 1990 to reply to this voluminous document. Counsel for AMS previously requested this extension from Ms. Colleen Woodhead, Counsel for NRC, due to other pressing matters, but she refused to agree to more than a 15-day extension even though she was informed that, unlike the NRC, AMS' attorneys are sole practitioners. This motion is not interposed for purposes of delay.

Based upon the foregoing, AMS respectfully requests this motion be granted. A proposal order is attached.

Respectfully submitted,

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Attorneys for Advanced Medical Systems, Inc.

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#### UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

# ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:

Robert M. Lazo, Chairman Harry Foreman Ernest E. Hill

In The Matter of:
ADVANCED MEDICAL SYSTEMS, INC.

Docket No. 30-16055-SP ASLBP No. 87-545-01-SP (Suspension Order)

## ORDER

For good cause shown, the time allowed for Advanced Medical Systems, Inc. to respond to the "NRC Staff Motion for Summary Disposition" is extended to March 7, 1990. It is so ordered.

FOR THE ATOMIC SAFETY AND LICENSING BOARD

Robert M. Lazo, Chairman ADMINISTRATIVE JUDGE

Dated at Bethesda, Maryland this \_\_\_\_day of \_\_\_\_, 1990.

### PROOF OF SERVICE

The undersigned hereby certifies that a true, accurate and complete copy of the foregoing Advanced Medical Systems, Inc.'s Motion for Extension of Time was sent via ordinary United States Express Mail, on this 29th day of January.

1990, to:

Administrative Judge Robert M. Lazo, Chairman Atomic Safety & Licensing Board Panel U.S. Nuclear Regulatory Commission Washington, DC 20555

Administrative Judge Ernest E. Hill HILL ASSOCIATES 210 Montego Drive Danville, CA 94526

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