

**IN THE
UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA**

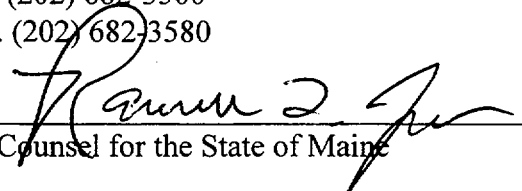
State of Maine,	)	
	)	
Petitioner,	)	
	)	
v.	)	No. 00-1476
	)	
Nuclear Regulatory Commission and	)	
United States of America,	)	
Respondents.	)	
	)	

**STATE OF MAINE'S UNOPPOSED MOTION FOR LEAVE
TO FILE MOTION FOR EXTENSION
OF TIME OUT OF TIME**

Pursuant to Federal Rule of Appellate Procedure 27(h), the State of Maine (the "State") moves for leave to file its Unopposed Motion for Extension of Time to File Reply to Respondent's and Intervenor's Opposition to Motion for Stay out of time. During the Thanksgiving holiday week, which resulted in a shortened week, the State of Maine and Nuclear Regulatory Commission ("NRC") discussed a framework for resolving the issues raised by the State's petition and motion for stay. Progress has been made, but because some key personnel were unavailable due to the holiday, the parties were unable to reach a final agreement. Further, also due to the holiday-shortened week, the State and NRC discussions did not occur until later in the week. As a result, the State could not file its Unopposed Motion for Extension of Time prior to two days before November ²⁷~~26~~. Counsel for the NRC, Maine Yankee, and NAC International have advised counsel for the State that they do not oppose the present motion.

Respectfully submitted,

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By: 

Counsel for the State of Maine

Date: November 27, 2000

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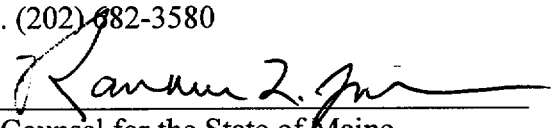
**STATE OF MAINE'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO FILE
REPLY TO RESPONDENT'S AND INTERVENORS'
OPPOSITION TO MOTION FOR STAY**

In light of ongoing settlement discussions among the parties, the State of Maine (the "State") moves for a one-week extension of the time for filing its reply to respondent's and intervenors' opposition to the State's motion for a stay. On November 9, 2000, the State filed its Motion for Emergency Stay of the Nuclear Regulatory Commission's Rule Approving the NAC-UMS Spent Nuclear Fuel Storage System. That same day, the Court ordered respondents to file and hand-deliver their response by noon on November 20, 2000, and for petitioner to file and hand-deliver its response by noon on November 27, 2000. On November 20, 2000, respondents filed their opposition to the State's motion, and Maine Yankee Atomic Power Company ("Maine Yankee") and NAC International moved to intervene and filed oppositions to the motion for a stay.

During the intervening holiday-shortened week, the State and respondent Nuclear Regulatory Commission have discussed a framework for resolving the issues raised by the State's petition and motion for a stay. Progress has been made, but because some key personnel were unavailable due to the holiday, the parties were unable to reach a final agreement. The parties believe that they will either reach an agreement or determine that no agreement is possible within an additional week. Thus, respondents do not oppose the State's request for an extension until noon on December 4, 2000, to file and hand serve its reply to the opposition to the motion for a stay. Counsel for Maine Yankee and NAC International have advised counsel for the State that they do not oppose the State's request for an extension.

Respectfully submitted,

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By: 

Counsel for the State of Maine

Date: November 27, 2000

CERTIFICATE OF SERVICE

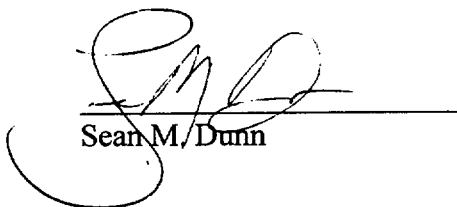
I hereby certify that on this 27th day of November 2000, copies of the foregoing Unopposed Motion for Extension of Time to File Reply to Respondent's and Intervenors' Opposition to Motion for Stay and Unopposed Motion for Leave to File Motion for Extension of Time Out of Time were served by hand delivery upon the following:

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