

FILED
 DATE: 4/17/13 TIME: _____ am/pm
 By: [Signature]
 CLERK, FSM SUPREME COURT
 KOSRAE
 TRIAL DIVISION

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Counsel for Plaintiffs

**IN THE SUPREME COURT OF
 THE FEDERATED STATES OF MICRONESIA
 TRIAL DIVISION - STATE OF KOSRAE**

BETSY ROSE MONGKEYA, et., al.,)	CIVIL ACTION NO. 2010-2002
)	
Plaintiffs,)	
)	
v.)	
)	
KOSRAE STATE GOVERNMENT,)	MOTION FOR AN
KOSRAE STATE HOSPITAL, et. al.,)	ENLARGEMENT OF TIME
)	
Defendants.)	
)	

COMES NOW, plaintiffs, by and through the undersigned counsel, and hereby requests the Court's favorable consideration in allowing an enlargement of time within which to file their responses to the defendants' Canvasback Mission's Motion to Suppress the Depositions. This motion is based on the following Memorandum of Points and Authorities.

MEMORANDUM OF POINTS AND AUTHORITIES

The defendant Canvasback Missions have moved the Court to suppress the depositions taken earlier in this matter based on the fact that they did not receive notice of the depositions. Plaintiffs have until Monday April 15, 2013 to respond to the

1 motions, but need further time to prepare the response to the
2 motion. Rule 6(b)(1) of the FSM Rules of Civ. Proc.
3 specifically provides for parties to seek enlargements.

4 (b) Enlargement. When by these rules or by a notice given
5 thereunder or by order of court an act is required or
6 allowed to be done at or within a specific time, the court
7 for cause shown may at any time in its discretion (1) with
8 or without motion or notice order the period enlarged if
9 request therefor is made before the expiration of the
10 period originally prescribed or as extended by a previous
11 order, or"

12 Plaintiffs are filing this motion prior to the expiration
13 of the deadline therefore the above rule requirement is met.
14 Plaintiffs therefore seek an enlargement of time up to Monday,
15 April 22, 2013 within which to file a response.

16 Rule 6(d) Certification - Counsel for Canvasback Missions,
17 Aaron Warren, was contacted about this motion and he does not
18 object.

19 CONCLUSION

20 Good cause apparent, plaintiffs seek the Court's kind
21 understanding in extending the deadline to file the response to
22 the motion to suppress up to April 22, 2013.

23 Date: 15 March 2013

24 Respectfully Submitted:


Marstella E. Jack
Counsel for Plaintiff

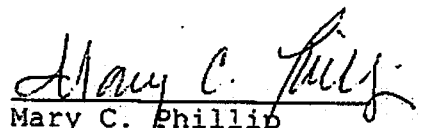
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CERTIFICATE OF SERVICE

This is to certify that on 15 April 2013, I served a true and correct copy of the above going Enlargement Motion on the following counsels:

1. Cindy Haro - Counsel for Kosrae State Government
Attorney General
Kosrae State Government

2. Aaron Warren - Counsel for Canvasback Missions
Assistant Attorney General
FSM Department of Justice


Mary C. Phillip