

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

ALASKA BUILDING, INC., an Alaska)
corporation,)

Plaintiff,)

vs.)

716 WEST FOURTH AVENUE LLC, and)
LEGISLATIVE AFFAIRS AGENCY,)
Defendants.)

RECEIVED
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BY:


Case No.: 3AN-15-05969 CI

**UNOPPOSED MOTION TO EXTEND FILING DEADLINE FOR
716 WEST FOURTH AVENUE, LLC'S REPLY TO PLAINTIFF'S
OPPOSITION TO 716'S MOTION FOR RULING OF LAW PRECLUDING
ALASKA BUILDING, INC.'S CLAIMS FOR QUI TAM AND PUNITIVE
DAMAGES**

Defendant 716 West Fourth Avenue, LLC ("716"), by and through counsel Ashburn & Mason, P.C., hereby moves the court to extend the deadline by which it is to reply to Plaintiff's opposition to 716's Motion for Ruling of Law Precluding Plaintiff's Claims for Qui Tam and Punitive Damages. 716 seeks an additional two days to reply. Plaintiff does not oppose this request. This motion is accompanied by the attached affidavit of counsel and proposed order.

ASHBURN & MASON, P.C.
Attorneys for 716 West Fourth Avenue, LLC

DATED: 11-20-15

By: 
Jeffrey W. Robinson
Alaska Bar No. 0805038

ASHBURN & MASON P.C.
LAWYERS
1227 WEST 9TH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
TEL 907.276.4331 • FAX 907.277.8235

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served electronically messenger
 facsimile U.S. Mail on the 20 day of ~~October~~ November 2015, on:

James B. Gottstein
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406 G Street, Suite 206
Anchorage, Alaska 99501

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ASHBURN & MASON

By: Heidi Wyckoff
Heidi Wyckoff

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UNOPPOSED MOTION TO EXTEND FILING DEADLINE FOR
716 TO REPLY TO PLAINTIFF'S OPPOSITION TO 716 MOTION FOR RULING OF LAW
Alaska Building, Inc. vs. 716 West Fourth Avenue, LLC, et. al. 3AN-15-05969Civil
{10708-101-00305215;1}

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

ALASKA BUILDING, INC., an Alaska)
corporation,)

Plaintiff,)

vs.)

Case No.: 3AN-15-05969 CI

716 WEST FOURTH AVENUE LLC, and)
LEGISLATIVE AFFAIRS AGENCY,)
Defendants.)

**AFFIDAVIT OF JEFFREY W. ROBINSON IN SUPPORT OF UNOPPOSED
MOTION TO EXTEND FILING DEADLINE FOR 716 TO FILE REPLY TO
PLAINTIFF'S OPPOSITION TO 716'S MOTION FOR RULING OF LAW
PRECLUDING ALASKA BUILDING, INC.'S CLAIMS FOR QUI TAM AND
PUNITIVE DAMAGES**

STATE OF ALASKA)
) ss.
THIRD JUDICIAL DISTRICT)

I, Jeffrey W. Robinson, being first duly sworn upon oath, depose and state:

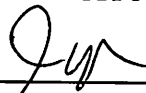
1. I am an attorney with the law firm of Ashburn & Mason, P.C., counsel for 716 West Fourth Avenue, LLC ("716") in the above-captioned case, and submit this affidavit in support of 716 West Fourth Avenue, LLC's Unopposed Motion to Extend Filing Deadline for 716 to file a Reply to Plaintiff's Opposition to 716's Motion for Ruling of Law Precluding Alaska Building, Inc.'s claims for *Qui Tam* and Punitive Damages. I have personal knowledge of all facts described herein.

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2. The deadline to reply to Plaintiff's opposition is 11/20/2015. Plaintiff, who is out of the office until December 6, 2015 has agreed to allow Defendant to file a reply by November 24, 2015. This matter was discussed, and agreed to, by parties' counsel in an email dated November 20, 2015. Counsel for 716 has three affiliated briefs in this case that it is filing today and two briefs it is filing in the severed construction case. It was not feasible to file all six by today, and 716 is asking for only two additional days.

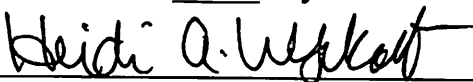
3. This motion is not made for purposes of undue harassment or delay.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

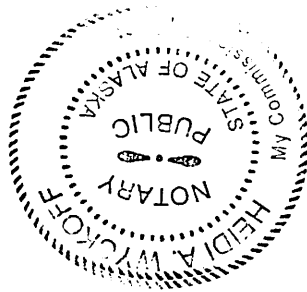


Jeffrey W. Robinson

SUBSCRIBED AND SWORN to before me this 20 day of ^{November}~~October~~, 2015.



NOTARY PUBLIC in and for Alaska
My Commission Expires: 1/1/2019



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Alaska Building, Inc. vs. 716 West Fourth Avenue, LLC, et. al. 3AN-15-05969Civil

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Plaintiffs,)

vs.)

Case No.: 3AN-15-05969 Civil

716 WEST FOURTH AVENUE LLC, and)
LEGISLATIVE AFFAIRS AGENCY,)

Defendants.)

[PROPOSED] ORDER GRANTING THE UNOPPOSED MOTION TO EXTEND FILING DEADLINE FOR 716 TO REPLY TO PLAINTIFF'S OPPOSITION TO 716'S MOTION FOR RULING OF LAW PRECLUDING ALASKA BUILDING, INC.'S CLAIMS FOR QUI TAM AND PUNITIVE DAMAGES

This Court, having reviewed 716 West Fourth Avenue LLC's Unopposed Motion to Extend Filing Deadline for 716 to Reply to Plaintiff's Opposition to 716's Motion for Ruling of Law Precluding Plaintiff's *Qui Tam* and Punitive Damages, and being duly advised in the premises, enters the following ORDER:

716 may file a reply by **November 24, 2015**.

DATED this ___ day of _____, 2015.

HON. PATRICK J. McKAY
Superior Court Judge

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[PROPOSED] ORDER RE UNOPPOSED MOTION TO EXTEND FILING DEADLINE FOR 716 TO REPLY TO PLAINTIFF'S
OPPOSITION TO 716'S MOTION FOR RULING OF LAW PRECLUDING QUI TAM AND PUNITIVE DAMAGES CLAIM
Alaska Building, Inc. vs. 716 West Fourth Avenue, LLC, et. al. 3AN-15-05969Civil