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

ALASKA BUILDING, INC., an Alaska corporation,	RECEIVED
	JUN 7 2016
Plaintiff,	BY:
VS.)
) Case No.: 3AN-15-05969 CI
716 WEST FOURTH AVENUE LLC, and)
LEGISLATIVE AFFAIRS AGENCY,)
Defendants.)
)

UNOPPOSED MOTION TO FOR TWO DAY EXTENSION OF TIME FOR 716 WEST FOURTH AVENUE, LLC TO FILE ITS OPPOSITION TO PLAINTIFF'S MOTION FOR FEES AND COSTS

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 file its Opposition to Plaintiff's Motion for Fees and Costs. 716 seeks an additional two (2) days to submit its opposition. Counsel for the Agency and ABI do not oppose this request. This motion is accompanied by the attached proposed order and affidavit of counsel.

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

Jeffrey W. Robinson
Alaska Bar No. 0805038

ASHBURN CAMASON P.C.
LAWYERS
1227 WEST 9TH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501
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{10708-101-00340995;1}

Page 1 of 2

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TEL 907.276.4331 • FAX 907.277.8235

<u>CERTIFICATE OF SERVICE</u>
I certify that a copy of the foregoing was served electronically messenger facsimile U.S. Mail on the day of June, 2016, on:
James B. Gottstein
Law Offices of James B. Gottstein
406 G Street, Suite 206
Anchorage, Alaska 99501

Kevin Cuddy Stoel Rives, LLP 510 L Street, Suite 500 Anchorage, Alaska 99501

ASHBURN & MASON

UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE OPPOSITION TO MOTION FOR FEES AND COSTS Alaska Building, Inc. vs. 716 West Fourth Avenue, LLC, et. al. 3AN-15-05969Civil {10708-101-00340995;1}

ASH BURN CANASON I.C. LAWYERS 1227 WEST 9TH AVENUE, SUITE 200 ANCHORAGE, ALASKA 99501 TEL 907.276.4331 FAX 907.277.8235

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

ALASKA BUILDING, INC., an Alaska) corporation,)	JUN 7 2016
Plaintiff,)	BY:
vs.) 716 WEST FOURTH AVENUE LLC, and) LEGISLATIVE AFFAIRS AGENCY,) Defendants.)	Case No.: 3AN-15-05969 CI

AFFIDAVIT OF JEFFREY W. ROBINSON IN SUPPORT OF UNOPPOSED MOTION TO EXTEND DEADLINE FOR 716 WEST FOURTH AVENUE, LLC TO FILE OPPOSITION TO PLAINTIFF'S MOTION FOR FEES AND COSTS

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 Deadline for 716 West Fourth Avenue, LLC to file its Opposition to Plaintiff's Motion for Fees and Costs. I have personal knowledge of all facts described herein.
- 2. I have personally received assurances from counsel for the Legislative Affairs Agency and for Alaska Building, Inc. that they do not oppose the requested extension.

{10708-101-00340998;1}

Page 1 of 3

1 BURN X MASON I.C.
LAWYERS
127 WEST 9TH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501

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 (day of June, 2016.

NOTAPL TO PUBLIC TO AUGUST OF ALACTIC OF ALA

NOTARY PUBLIC in and for Alaska
My Commission Expires: 42 VII 204

AFFIDAVIT IN SUPPORT OF UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE OPPOSITION TO MOTION FOR FEES AND COSTS

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

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served \square electronically \square messenger \square facsimile \square U.S. Mail on the \square day of January, 2016, on:

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

Kevin Cuddy Stoel Rives, LLP 510 L Street, Suite 500 Anchorage, Alaska 99501

ASHBURN & MASON

Heidi Wyckoff

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AFFIDAVIT IN SUPPORT OF UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE OPPOSITION TO MOTION FOR FEES AND COSTS

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

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

ALASKA BUILDING, INC., an Alaska)	RECEIVED
corporation,)	JUN 7 2016
Plaintiffs,)	BY:
vs.)	
)	Case No.: 3AN-15-05969 Civil
716 WEST FOURTH AVENUE LLC, and	1)	
LEGISLATIVE AFFAIRS AGENCY,)	
)	
Defendants.)	
)	
)	

[PROPOSED] ORDER GRANTING THE UNOPPOSED MOTION TO EXTEND TWO DAY DEADLINE FOR 716 WEST FOURTH AVENUE, LLC TO FILE ITS OPPOSITION TO PLAINTIFF'S MOTION FOR FEES AND COSTS

This Court, having reviewed 716 West Fourth Avenue LLC's Unopposed Motion to Extend Deadline for 716 West Fourth Avenue, LLC to file its Opposition to Plaintiff's Motion for Fees and Costs, and being duly advised in the premises, enters the following ORDER:

716 West Fourth Avenue, LLC shall have until **Wednesday**, **June 8, 2016** to file its Opposition.

DATED this ____ day of ______, 2016.

HON. PATRICK J. McKAY Superior Court Judge

ASHBURN SAMASON INC.

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Page 1 of 2

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served electronically messenger day of June, 2016.

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[PROPOSED] ORDER RE UNOPPOSED MOTION TO EXTEND DEADLINE FOR 716 TO FILE OPPOSITION TO MOTION FOR FEES AND COSTS

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

Page 2 of 2

{10708-101-00340997;1}