



2. The Court's September 3, 2013 order and the 14 day time limit for filing a motion for attorneys' fees and costs came as no surprise to and therefore work no hardship on counsel for NDPSC.
3. Counsel for NDPSC references as a pressing obligation a case in which they filed a complaint on September 12, 2013, the same day on which counsel filed their Motion for Extension of Time in this matter. See Doc. No. 54 at ¶ 11.
4. In requesting an extension of time until October 11, counsel for NDPSC references deadlines in other matters *between* September 17 and October 11, which in no way support the argument that an October 11 deadline will be any easier for counsel to meet than a September 17 deadline. See Doc. No. 54 at ¶¶ 14 and 16.

DRC concludes that the press of business complained of by counsel for NDPSC was to a large extent avoidable and urges the Court to enforce the deadline mandated at Fed. R. Civ. P. 54(2)(B).

Respectfully submitted this 13<sup>th</sup> day of September,  
2013.

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**CERTIFICATE OF SERVICE**

I certify that on the 13<sup>th</sup> day of September, 2013, Baumstark Braaten Law Partners served copies of the attached document by CM/ECF as follows:

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