

IN THE CHANCERY COURT FOR KNOX COUNTY, TENNESSEE

IN RE: PETITION OF)
KNOX COUNTY PUBLIC DEFENDER)

Docket No. 174552-L

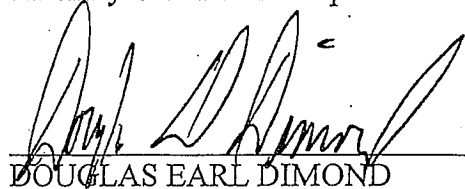
MOTION TO EXTEND TIME TO FILE SUPPLEMENTAL BRIEF

The Attorney General, on behalf of the Administrative Office of the Courts ("AOC"), respectfully requests that this Court extend the time to file the appellee's supplemental brief. At a hearing on October 29, 2009, this Court requested supplemental briefing on the issue of this Court's jurisdiction. The undersigned indicated to the Court that he would attempt to file his reply to the Public Defender's brief before departing for a visit to his daughter in Japan on December 16, 2009, but was unsure whether time would permit. The Court understood and indicated that the undersigned would be given additional time if necessary. This has become necessary, due in part to unexpected filings in a massive and complex federal class action case involving thousands of children in state custody in which the undersigned is lead counsel for the State.

Accordingly, the undersigned respectfully requests this Court to set the undersigned's supplemental reply brief to be filed on or before January 25, 2010.

Respectfully submitted,

ROBERT E. COOPER, JR.
Attorney General and Reporter



Handwritten signature of Douglas Earl Dimond in black ink, written over a horizontal line.

DOUGLAS EARL DIMOND
Senior Counsel
BPR #017953
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GENERAL CIVIL DIVISION
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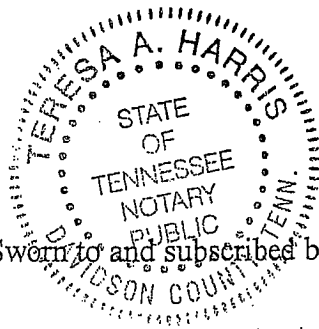
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AFFIDAVIT

STATE OF TENNESSEE)
COUNTY OF DAVIDSON)

Douglas Earl Dimond, being sworn, says:

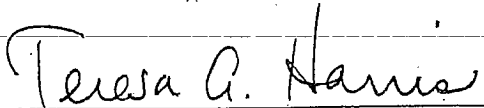
1. I am a Senior Counsel for the State of Tennessee and, as such, I represent the appellee, the Administrative Office of the Courts, in this matter.
2. The facts set forth in the accompanying motion and memorandum of law are true to the best of my knowledge, information, and belief.





DOUGLAS EARL DIMOND

Sworn to and subscribed before me on this 16th day of December 2009.



NOTARY PUBLIC

My Commission Expires: 11/22/10

CERTIFICATE OF SERVICE

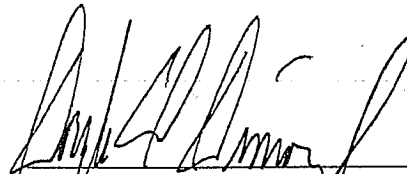
I certify that a copy of the foregoing motion and affidavit was forwarded by first class
U.S. Mail, postage paid, to:

T. Maxfield Bahner
1000 Tallan Building
Chattanooga, TN 37402-2500

Hugh J. Moore, Jr.
1000 Tallan Building
Two Union Square
Chattanooga, TN 37402-2500

Mark E. Stephens
District Public Defender
1101 Liberty Street
Knoxville, TN 37919

on this 16th day of December 2009.



DOUGLAS EARL DIMOND
Senior Counsel