

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

CAMPAIGN LEGAL CENTER,)	
)	
)	
Plaintiff,)	
v.)	Case No. 18-cv-1187 (TSC)
)	
U.S. DEPARTMENT OF JUSTICE,)	
)	
)	
Defendant.)	
_____)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO
FILE DEFENDANT’S SUMMARY JUDGMENT REPLY AND OPPOSITION**

Defendant, by and through the undersigned counsel, respectfully moves this Court pursuant to Federal Rule of Civil Procedure 6(b)(1) to extend by five days the deadline for Defendant to file its Reply in Support of Motion for Summary Judgment and Opposition to Plaintiff’s Cross-Motion for Summary Judgment, and to adjust the other briefing deadline accordingly in this Freedom of Information Act case. The current deadline for Defendant’s Motion is November 14, 2018. The undersigned counsel conferred with Plaintiff’s counsel and Plaintiff does not oppose the extension.

Good cause supports this motion. The undersigned counsel will have to be out of the office tomorrow, November 14, to accompany another person to a recently-scheduled medical procedure. In addition, counsel recently learned that he will be attending a deposition on November 15. Counsel also has another deposition scheduled for November 16. Accordingly, additional time will be required to finalize Defendant’s combined reply and opposition.

Defendant therefore respectfully requests that the Court extend the deadline for Defendant's combined reply and opposition by five days and to extend the other briefing deadline by five days so that the new schedule is as follows:

November 19, 2018 Defendant files Reply in Support of Motion for Summary Judgment and Opposition to Plaintiff's Cross-Motion for Summary Judgment

December 10, 2018 Plaintiff files Reply in Support of Cross-Motion for Summary Judgment

Thus, good cause supports this motion, and it is being filed in good faith and not for purposes of undue delay. Defendant previously sought, and the Court granted, an extension of time to file Defendant's summary judgment motion.

A proposed Order is attached hereto.

Respectfully submitted,

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D.C. BAR # 472845

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D.C. BAR # 924092

By: _____/s/_____

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