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6 UNITED STATES DEPARTMENT OF JUSTICE

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8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 WILLIAM M. BRYSON, JR.,)
11 Plaintiff,) Case No. 1:13-cv-00879 LJO/MJS
12 v.) EX PARTE REQUEST TO EXTEND
13 SUSAN B. GERSON, AS ACTING) TIME TO RESPOND TO
14 ASSISTANT DIRECTOR OF THE FREEDOM) PLAINTIFF'S OPPOSITION TO
15 OF INFORMATION UNIT, OR HER) MOTION FOR SUMMARY
16 SUCCESSOR,) JUDGMENT; ORDER
Defendant.)

17 Defendant United States Department of Justice ("Defendant"), requests a continuance of the
18 time in which to respond to Plaintiff's Opposition to Defendant's Motion for Summary Judgment.
19 [Dkt No. 22].

20 Plaintiff requested, and was granted, an unopposed extension of time of thirty days within
21 which to oppose Defendant's Motion for Summary Judgment. Said request was granted by Minute
22 Order dated June 23, 2015, [Dkt No. 21] allowing Plaintiff's opposition to be filed on or before July
23 30, 2015. Plaintiff filed his Opposition on July 30, 2015 making Defendant's reply due August 6,
24 2015. After Defense counsel agreed to the extension and the Court approved the same, she arranged
25 a vacation and will be out of the office three of the five business days by which the reply will be due.
26 Because Defense counsel will be out of the office, she will not have sufficient time to review
27 Plaintiff's sixty-two (62) page opposition and prepare a meaningful response on behalf of the
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1 Defendant. Therefore, Defendant is requesting a fourteen (14) day extension of time, to and
2 including August 20, 2015 by which to file its reply. No prejudice will be suffered by Plaintiff if this
3 brief extension is granted as there are no pending deadlines in this action.

4 Accordingly, for good cause showing, including the unavailability of counsel and the volume
5 of documents submitted with Plaintiff's Opposition, Defendant requests a fourteen (14) day extension
6 of time, to and including August 20, 2015, by which to file its reply.

7 Respectfully submitted,

8 Dated: July 30, 2015

BENJAMIN B. WAGNER
UNITED STATES ATTORNEY

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11 /s/Alyson A. Berg
ALYSON A. BERG
12 Assistant United States Attorney
Attorney for Defendant United States
13 Department of Justice

14 **ORDER**

15 For good cause showing and in accordance with Local Rule 144(c) (initial ex parte extension),
16 Defendant, United States Department of Justice, is granted an extension of time to and including
17 August 20, 2015, within which to file its reply to Plaintiff's Opposition to Defendant's Motion for
18 Summary Judgment.

19 IT IS SO ORDERED.

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21 Dated: August 3, 2015

/s/ Lawrence J. O'Neill
UNITED STATES DISTRICT JUDGE