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15 Attorneys for Truthout

16 **UNITED STATES DISTRICT COURT**

17 **EASTERN DISTRICT OF CALIFORNIA**

18	TRUTHOUT,	*	Case No.: 2:12-cv-02601 (LKK) (CKD)
		*	
19	Plaintiff,	*	
		*	
20	v.	*	CONSENT MOTION FOR
		*	
21	DEPARTMENT OF JUSTICE,	*	BRIEF ENLARGEMENT OF TIME
		*	
22	Defendant.	*	
		*	
23	* * * * *	*	

24 NOW COMES Plaintiff to respectfully request a brief further enlargement of time
 25 pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, to and including 10 December
 26 2013, within which to file its Opposition to Defendant’s Motion for Summary Judgment (filed
 27 Sept. 9, 2013).

28 Plaintiff has good cause to request this extension. The parties have been discussing ways
 29 in which they may be able to reduce the number of issues in controversy, and they request an

1 additional four business days to allow them to continue the negotiation. On 10 December 2013
2 Plaintiff intends to either file its Opposition or, if necessary, propose, after conferring with the
3 Government, a new briefing schedule.¹

4 This is the second extension requested for this filing. Defendant consented in general² to
5 this Motion and asks that its Reply deadline be moved to 10 February 2014, to which Plaintiff
6 agrees. The parties do not believe that this extension should affect the hearing scheduled for 17
7 March 2014.

8 Date: December 4, 2013

NATIONAL SECURITY COUNSELORS

9 By: /s/ Kelly McClanahan

Kelly McClanahan

10 Attorney for Truthout

11
12
13 **ORDER**

14
15 It is APPROVED and SO ORDERED.

16
17 Dated: December 6, 2013.

18 

LAWRENCE K. KARLTON

19 SENIOR JUDGE

UNITED STATES DISTRICT COURT

20 _____
21 ¹ If the parties agree that Defendant will perform an additional search for records, the case will
need to be stayed to allow the Government sufficient time to do so.

22 ² Defendant's counsel consented on the telephone to this extension, and then asked to be sent the
23 written motion before it was filed for final approval, which the undersigned did at 3:54 PM PST.
However, Defendant's counsel has not responded yet, so the undersigned is filing this Motion
now to maximize the chance of the Court seeing it and ruling on it before midnight.