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 Counsel for Defendants  
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10 UNITED STATES DISTRICT COURT  
 11 SOUTHERN DISTRICT OF CALIFORNIA

12 LATHAM & WATKINS LLP,	)	Case No. 07cv0245 DMS (LSP)
	)	
13 Plaintiff,	)	
	)	
14 v.	)	
	)	
15 UNITED STATES ENVIRONMENTAL	)	JOINT MOTION TO EXTEND TIME FOR
16 PROTECTION AGENCY,	)	FILING OF RESPONSIVE PLEADING
	)	
	)	
17 Defendant.	)	[Fed.R.Civ.P. 6(b)(1)]
	)	

18  
 19 COME NOW THE PARTIES, Plaintiff Latham & Watkins LLP, by and through its counsel, and  
 20 Defendant, U.S. Environmental Protection Agency, by and through its counsel, and hereby jointly move  
 21 the Court to extend the time for filing of Defendant’s responsive pleading.

22 Plaintiff complains that Defendant improperly withheld the production of documents under the  
 23 Freedom of Information Act (“FOIA”), 5 U.S.C. § 552 et seq. Plaintiff seeks declaratory and injunctive  
 24 relief, including the production of the documents withheld by Defendant under FOIA exemptions.

25 In an effort to resolve Plaintiff’s complaints and without waiving Defendants’ rights to defend  
 26 the causes of actions and allegations, including the right to file any Fed. R. Civ. P. 12 motions to dismiss,  
 27 the parties now jointly request that the Court extend the date upon which Defendant’s responsive  
 28 pleading is due until April 23, 2007. The parties have not previously requested an extension of time.

1 Based upon the foregoing, it is respectfully requested that the Court enter an order, under  
2 Fed. R. Civ. P. 6(b)(1), expanding the time for the filing of Defendant's responsive pleading until April  
3 23, 2007.

4

5 DATED: March 9, 2007 s/ Patricia Guerrero  
6 Counsel for Plaintiff  
E-Mail: patricia.guerrero@lw.com

7 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures  
8 of the United States District Court for the Southern District of California, I certify that the content of this  
9 document is acceptable to counsel for the Plaintiff and that I have obtained authorization from Patricia  
10 Guerrero to affix her electronic signature to this document.

11

12 DATED: March 9, 2007 KAREN P. HEWITT  
United States Attorney  
13 CINDY CIPRIANI  
Assistant U.S. Attorney  
14 s/ Megan E. Callan  
15 MEGAN E. CALLAN  
Assistant United States Attorney  
16 Counsel for Defendants  
17 E-Mail: Megan.Callan@usdoj.gov

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10 UNITED STATES DISTRICT COURT  
 11 SOUTHERN DISTRICT OF CALIFORNIA

12	LATHAM & WATKINS LLP,	)	Case No. 07cv0245 DMS (LSP)
13	Plaintiff,	)	
14	v.	)	
15	UNITED STATES ENVIRONMENTAL	)	JOINT MOTION TO EXTEND TIME FOR
16	PROTECTION AGENCY,	)	FILING OF RESPONSIVE PLEADING
17	Defendant.	)	[Fed.R.Civ.P. 6(b)(1)]

18  
 19 IT IS HEREBY CERTIFIED THAT:

20 I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My  
 21 business address is 880 Front Street, Room 6293, San Diego, California 92101-8893.

22 I am not a party to the above-entitled action. I have caused service of:

23 JOINT MOTION TO EXTEND TIME FOR FILING OF RESPONSIVE  
 PLEADING

24 on the following party by electronically filing the foregoing with the Clerk of the District Court using  
 25 its ECF System, which electronically notifies them.

26 Patricia Guerrero  
 Counsel for Plaintiff  
 E-Mail: patricia.guerrero@lw.com

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I hereby certify that I have caused to be mailed the foregoing, by the United States Postal Service, to the following non-ECF participants on this case:

N/A

the last known address, at which place there is delivery service of mail from the United States Postal Service.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 9, 2007.

s/ Megan E. Callan  
Megan E. Callan