

**UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA**

**Talal AL-ZAHRANI, et al.,** )

)

**Plaintiffs,** )

)

**v.** )

**Case No.: 1:09-CV-00028 (ESH)**

)

**Donald RUMSFELD, et al.** )

)

**and** )

)

**UNITED STATES,** )

)

**Defendants.** )

)

**DEFENDANTS' CONSENT MOTION FOR ENLARGEMENT OF TIME FOR  
DEFENDANTS TO RESPOND TO PLAINTIFFS' MOTIONS FOR  
RECONSIDERATION AND FOR LEAVE TO AMEND**

Pursuant to Federal Rule of Civil Procedure 6(b)(1), the United States and the Individual Named Defendants (collectively, "Defendants") respectfully move this Court for a 16-day enlargement of time, up to and including April 15, 2010, for Defendants to respond to Plaintiffs' Motion for Reconsideration in Light of Newly Discovered Evidence and Motion for Leave to Amend in Light of Newly Discovered Evidence. In support of this motion, Defendants assert as follows:

1. Plaintiffs instituted this action with the filing of their Complaint on January 7, 2009.
2. Plaintiffs amended their Complaint on January 29, 2009.
3. Defendant United States filed a motion to substitute and Defendants filed motions to dismiss Plaintiffs' claims on June 26, 2009.
4. Plaintiffs opposed Defendants' motions on October 5, 2009.
5. Defendants replied to Plaintiffs' opposition on December 4, 2009.

6. On February 16, 2010, the Court granted Defendants' motions and dismissed Plaintiffs' claims, with prejudice.

7. On March 16, 2010, Plaintiffs filed both a Motion for Reconsideration in Light of Newly Discovered Evidence and a Motion for Leave to Amend in Light of Newly Discovered Evidence. These motions raise numerous factual allegations and legal arguments not included in Plaintiffs' earlier filings.

8. Pursuant to Local Rule 7(m), the Defendants' counsel contacted Plaintiffs' counsel, Pardiss Kebriaei, on March 17, 2010, regarding the contents of this motion. Plaintiffs, through counsel, graciously consented to this motion.

9. This request is made in good faith and not for purposes of delay.

10. Defendants have not previously requested or been given an extension of time to respond to Plaintiffs' Motion for Reconsideration or Motion for Leave to Amend.

11. There are no other previously scheduled deadlines in this case.

Dated: March 17, 2010

Respectfully submitted,

TONY WEST  
Assistant Attorney General, Civil Division

ANN M. RAVEL  
Deputy Assistant Attorney General

TIMOTHY P. GARREN  
Director, Torts Branch

ANDREA W. McCARTHY  
Senior Trial Counsel

/s/ Paul E. Werner

ZACHARY C. RICHTER  
(Texas Bar # 24041773, under LCvR 83.2(e))  
PAUL E. WERNER  
(MD Bar, under LCvR 83.2(e))  
Trial Attorneys  
UNITED STATES DEPARTMENT OF JUSTICE  
Torts Branch, Civil Division  
P.O. Box 7146  
Ben Franklin Station  
Washington, D.C. 20044  
(202) 616-4152 (phone)  
(202) 616-4314 (fax)

Attorneys for the United States and the Individual  
Named Defendants

**CERTIFICATE OF SERVICE**

I hereby certify that on March 17, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Pardiss Kebriaei  
Shayana Kadidal  
CENTER FOR CONSTITUTIONAL RIGHTS  
666 Broadway, 7th Floor  
New York, NY 10012  
pkebriaei@ccrjustice.org  
*Counsel for Plaintiffs*

Meetalı Jain  
International Human Rights Clinic  
American University  
WASHINGTON COLLEGE OF LAW  
4801 Massachusetts Ave., N.W.  
Washington, DC 20016  
mjain@wcl.american.edu  
*Counsel for Plaintiffs*

/s/ Paul E. Werner  
PAUL E. WERNER  
(MD Bar, under LCvR 83.2(e))  
Trial Attorney  
United States Department of Justice  
Torts Branch, Civil Division  
P.O. Box 7146  
Ben Franklin Station  
Washington, DC 20044  
(202) 616-4152 (phone)