

Nadhira F. Al-Khalili (DSB #997827)
THE COUNCIL ON AMERICAN-
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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

YASIR AFIFI

Plaintiff

v.

ERIC H. HOLDER, et al

Defendants



CASE NO.:1:11-00460 BAH

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE A
RESPONSE TO DEFENDANTS’ MOTION TO DISMISS**

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure, Plaintiff Yasir Afifi, by and through the undersigned counsel, hereby moves for an extension of time of thirty one (31) days, up to and including August 5, 2011, to answer or otherwise respond to Defendants’ Motion to Dismiss. In support of this request, Plaintiff states as follows:

1. On June 16, 2011, Defendants filed a Motion to Dismiss Counts I, III, and IV of Plaintiff’s Second Amended Complaint and a Motion for Summary Judgment as to Count II. Plaintiff’s response to Defendants’ Motion to Dismiss is due on July 5, 2011.

2. Plaintiff Afifi needs more time to prepare an adequate response to Defendants' Motion to Dismiss. The undersigned counsel is working to draft the response but is also facing a series of hearings and filings in other cases.
3. The undersigned counsel has conferred with opposing counsel regarding this motion for an extension of time. Opposing counsel had no objection to this motion.
4. As this case is still in the early stages of litigation, Defendants will not be prejudiced by affording Plaintiff the additional time requested to respond to the Motion to Dismiss.

CONCLUSION

For the foregoing reasons, Plaintiff Afifi respectfully requests that the Court grant his motion and enlarge his time to respond to Defendants' Motion to Dismiss up to and including August 5, 2011.

Dated: June 28, 2011

Respectfully submitted,

By: /s/ Nadhira Al-Khalili

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CERTIFICATE OF SERVICE

I hereby certify that on June 28, 2011, a true and correct copy of the foregoing was served electronically by the U.S. District Court for the District of Columbia Filing System (ECF) and that the documents are available on the ECF system.

By: /s/ Nadhira Al-Khalili_____

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