

Nadhira F. Al-Khalili (VSB #46603)
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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

HON.: Judge Howell

**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 forty five (45) days, up to and including September 16, 2011, to answer or otherwise respond to Defendants' Holder and Mueller 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. Subsequent to a previously granted motion for extension of time, Plaintiff's response to Defendants' Motion to Dismiss became due on August 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 and concurred on the following modified briefing schedule: (1) a due date of September 16, 2011 for Plaintiff's response to the Motion to Dismiss and (2) a due date of October 7, 2011 for Defendants' reply to Plaintiff's response to the Motion to Dismiss.

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. And Plaintiff does not object to an extension of time for Defendants' reply.

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 September 16, 2011 and extend Defendants' time to reply up to and including October 7, 2011

Dated: August 2, 2011

Respectfully submitted,

By: /s/ Nadhira Al-Khalili_____

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CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2011, a true and correct copy of the foregoing was served electronically by the U.S. District Court for the District of Columbia Electronic Case Filing System (ECF) and that the documents are available on the ECF system.

By: /s/ Nadhira Al-Khalili

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