

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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YASIR AFIFI,)	
)	
	Plaintiff,)	
)	CIVIL ACTION NO.
v.)	1:11-00460 (BAH)
)	
ERIC H. HOLDER et al.)	
)	
	Defendants.)	
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**DEFENDANTS HOLDER AND MUELLER’S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO ANSWER COMPLAINT**

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure, defendants Eric H. Holder and Robert Mueller, by and through the undersigned counsel, hereby move for an extension of time of thirty (30) days, up to and including June 16, 2011, to answer or otherwise respond to plaintiff’s Complaint. In support of this request, defendants state as follows:

1. On March 18, 2011, plaintiff Yasir Afifi filed suit against defendants Holder and Mueller in their official capacities and unknown agents in their individual capacities, asserting claims under the Fourth Amendment, Privacy Act, Administrative Procedure Act, and First Amendment and seeking damages and injunctive and declaratory relief. Defendants’ response to the Complaint is due May 17, 2011.

2. Defendants Holder and Mueller need more time to prepare an adequate response to plaintiff’s claims. The undersigned counsel is working with the Federal Bureau of Investigation (“FBI”) to gather information about the underlying facts, but is also facing a press of matters in other cases.

3. Pursuant to Local Civil Rule 7(m), the undersigned counsel contacted counsel for plaintiff, who stated that she did not object to a 30-day extension of the time to respond to the Complaint.

4. As this case is still in the early stages of litigation, plaintiff will not be prejudiced by affording defendants the additional time requested to respond to the Complaint.

CONCLUSION

For the foregoing reasons, defendants Holder and Mueller respectfully request that the Court grant their motion and enlarge their time to respond to plaintiff's Complaint up to and including June 16, 2011.

Dated: May 4, 2011

Respectfully submitted,

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Assistant Attorney General

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/s/ Lynn Y. Lee
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*Attorneys for Defendants Holder and Mueller in
Their Official Capacities*

CERTIFICATE OF SERVICE

I hereby certify that on May 4, 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.

/s/ Lynn Y. Lee
LYNN Y. LEE