

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

ELECTRONIC PRIVACY INFORMATION CENTER,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.: 11-0881 (HHK)
	)	
FEDERAL TRADE COMMISSION,	)	
	)	
Defendant.	)	
	)	

**CONSENT MOTION TO ENLARGE TIME TO FILE ANSWER  
OR OTHERWISE RESPOND TO COMPLAINT**

Defendant, the Federal Trade Commission (“FTC”), respectfully requests an additional thirty days to file an answer or otherwise respond to the complaint in this case. This case arises under the Freedom of Information Act (“FOIA”). Plaintiff served the U.S. Attorney’s Office with the complaint on May 16, 2011, and the FTC’s answer is therefore currently due June 15, 2011. EPA requests thirty additional days and a new deadline of July 15, 2011. In a recent email exchange with counsel for Plaintiff regarding this motion, counsel for Plaintiff consented to this motion, on the condition that the FTC waive any defense based on failure to exhaust administrative remedies regarding the FTC’s most recent production of documents to Plaintiff. The FTC agrees to this condition and, accordingly, the parties consider this a consent motion.

Good cause exists for the Court to grant this motion under Rule 6(b)(1)(A) because the FTC needs additional time to process the numerous responsive records and to analyze the merits of the claims. The agency is working expeditiously on its processing.

This is the FTC’s first request to extend this deadline. A proposed order is attached.

