SOGHOIAN v. DEPARTMENT OF JUSTICE Doc. 14

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CHRISTOPHER SOGHOIAN,	)	
Plaintiff,	)	**Civil Action No. 11-1080 (ABJ)**
v.	)	**ECF**
DEPARTMENT OF JUSTICE,	)	
Defendant.	)	

DEFENDANT'S CONSENT MOTION FOR ENLARGEMENT OF TIME TO FILE MOTION FOR SUMMARY JUDGMENT AND TO AMEND THE COURT'S OCTOBER 11, 2011 SCHEDULING ORDER

Defendant, United States Department of Justice, by and through its undersigned counsel, respectfully moves this Court pursuant to Federal Rule of Civil Procedure 6(b)(1) for an enlargement of time of 17 days to, and including, February 6, 2012, in which to file a motion for summary judgment in this case, which arises under the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, as amended. Defendant's motion is due by January 20, 2012, pursuant to the Court's Scheduling Order dated October 11, 2011 (ECF No. 12). This is defendant's first request for an enlargement of time of this deadline. Pursuant to Local Rule 7(m), undersigned counsel has conferred with plaintiff, who is proceeding *pro se*, and plaintiff consents to the requested extension on the condition that plaintiff's opposition deadline is adjusted by 17 days. The parties further agree that defendant's reply will be due in 14 days rather the 21 days set in the initial scheduling order. A proposed order granting this motion is attached.

There is good cause to grant this motion. Undersigned counsel requires additional time to review the *Vaughn* declarations and indices submitted by the DOJ components that have processed records in response to plaintiff's FOIA request and to draft and file a motion for summary judgment.

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This time is required due to the press of other business during the initial period set by the Court for filing the dispositive motion. Specifically, undersigned counsel completed a two-week trial in *Gold v. Gensler*, Civil Action No. 09-2125 (RLW), on December 16, 2012, was on committed use-or-lose leave from December 19, 2011-January 2, 2012, and was required to travel to Charleston, South Carolina for depositions in *Reed v. Department of Navy*, Civil Action No. 10-1160 (ESH), on January 9-10, 2012. Additional depositions have been scheduled in the *Reed* case in Charleston on January 18-19, 2012 and in Washington, D.C. on February 1-3, 2012.

WHEREFORE, Defendant respectfully requests an enlargement of time of 17 days to file a motion for summary judgment and that the Court entered the proposed Order amending the October 11, 2011 Scheduling Order as agreed by the parties.

Respectfully submitted,

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