

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

| | | |
|-------------------------------------|---|--------------------------------|
| <p>CHRISTOPHER SOGHOIAN,</p> |) | |
| |) | |
| Plaintiff, |) | Civil Action No. 11-1080 (ABJ) |
| |) | |
| v. |) | ECF |
| |) | |
| DEPARTMENT OF JUSTICE |) | |
| |) | |
| Defendant. |) | |
| |) | |

**PLAINTIFF’S CONSENT MOTION FOR ENLARGEMENT OF TIME TO FILE A
REPLY TO PLAINTIFF’S CROSS-MOTION FOR SUMMARY JUDGMENT AND TO
AMEND THE COURT’S APRIL, 30 2012 MINUTE ORDER**

Plaintiff, Christopher Soghoian, *pro se*, respectfully moves this Court pursuant to Federal Rule of Civil Procedure 6(b)(1) for an enlargement of time of 8 days to, and including, June 22, 2012, in which to file a motion in reply to plaintiff’s cross-motion for summary judgment in this case, which arises under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, as amended. Plaintiff’s motion is due by June 14, 2012, pursuant to the Court’s Minute Order dated April 30, 2012.

On June 13, 2012, this court issued a minute order requiring the defendant to submit the full Vaughn index to the court on or before June 20th, 2012. Plaintiff understands that these documents were submitted on the afternoon of the 14th of June, the same date that plaintiff’s reply to the cross-motion is due.

In light of the defendant’s recent submission, plaintiff seeks an additional week in which to review the documents and then write the reply to the cross-motion.

Pursuant to Local Rule 7(m), plaintiff has conferred with defendant’s counsel, Mr. Interrante, and defendant consents to the requested extension.

WHEREFORE, Plaintiff respectfully requests an enlargement of time of 8 days to file a motion in reply to plaintiff’s cross-motion for summary judgment and that the Court enter the proposed Order amending the April 30, 2012 Minute Order as agreed by the parties.

Respectfully submitted,

/s/

CHRISTOPHER SOGHOIAN

(pro se)

1725 Irving St NW

Washington, DC 20010

Tel: 617-308-6368

Email: chris@soghoian.net

June 14, 2012