

**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 ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

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 30 days to, and including, August 12, 2011, in which to file an answer or otherwise respond to the complaint in this case (ECF No. 1), which arises under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, as amended. Defendant’s response to the FOIA complaint is due within 30 days of service or by July 14, 2011. This is defendant’s first request for an enlargement of time in this case. Pursuant to Local Rule 7(m), undersigned counsel has conferred with plaintiff, who is proceeding *pro se*, and plaintiff consents to the requested extension. A proposed order granting this motion is attached.

There is good cause to grant this motion. Undersigned counsel, who has been recently assigned to this case, requires additional time to review the allegations in the complaint and draft an answer. Counsel also requires additional time to confer and consult with the two agency components that have produced records in response to Plaintiff’s FOIA request subject to withholdings under FOIA exemptions.

