

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

DENNIS KUCINICH, <i>et al.</i> ,)	
)	
Plaintiffs,)	Case No. 1:11-cv-01096 (RBW)
)	
v.)	
)	
BARACK OBAMA, <i>et al.</i> ,)	
)	
Defendants.)	
)	

PLAINTIFFS' UNOPPOSED (FIRST) MOTION FOR AN EXTENSION OF TIME

Pursuant to Federal Rule of Civil Procedure 6(b), Plaintiffs request a 7-day extension of time, until September 9, 2011, within which to file their opposition to the Motion to Dismiss filed by the Defendants. This request is made in good faith and with good cause, as set forth below.

1. The original date for the filing of the opposition memorandum was September 2, 2011.
2. Plaintiffs' counsel, however, must confer with members of Congress before filing this opposition. Most members are currently out of town. Plaintiffs' counsel also returned recently from weeks out of the country and has been addressing previously scheduled filings and hearings in other federal cases.
3. Defendants have filed an extensive memorandum challenging the basis for the Complaint, which covers a broad scope of jurisdictional and policy arguments.
4. This is the first motion for an extension requested by the Plaintiffs.
5. The Defendants consent to the seven (7) day enlargement of time to allow

Plaintiffs to file their Opposition.

Dated: August 29, 2011

Respectfully submitted,

/s/ Jonathan Turley

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CERTIFICATE OF SERVICE

Pursuant to LCvR 5.3, I hereby certify that, on August 29, 2011, I electronically filed with the Clerk of the Court the foregoing Proof of Service of UNOPPOSED MOTION FOR EXTENSION OF TIME TO OPPOSE THE DEFENDANTS' MOTION TO DISMISS using the CM/ECF system, and service was effected electronically pursuant to LCvR 5.4(d) on the following party:

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