

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

NATIONAL VETERANS LEGAL
SERVICES PROGRAM, NATIONAL
CONSUMER LAW CENTER, and
ALLIANCE FOR JUSTICE, for themselves
and all others similarly situated,
Plaintiffs,

v.

UNITED STATES OF AMERICA,
Defendant.

Case No. 16-745-ESH

**PLAINTIFFS' UNOPPOSED MOTION TO EXTEND BRIEFING SCHEDULE
AND SUPPORTING MEMORANDUM**

The plaintiffs hereby request an extension of the time in which to file their motion for summary judgment. The motion is currently due on July 27, 2017, ten days after the class-notice period ends. The plaintiffs respectfully request an extension of 30 days, up to and including August 28, 2017. The government consents to this request. A proposed order is attached.

The purpose of this extension is to provide the government with additional time to respond to the plaintiffs' requests for discovery relevant to their anticipated summary-judgment motion—as contemplated by this Court's scheduling order of January 24, 2017. Dkt. 34. The plaintiffs have been seeking informal discovery from the government since late January, and formal discovery for the past three weeks. In response to these requests, the government has produced three documents to date—all before the plaintiffs served formal discovery on June 12. The government anticipates producing additional documents and/or interrogatory responses, which we had hoped to start receiving on a rolling basis last week. We now understand that we may not receive this additional discovery until next week or even later. The government's counsel

has cited competing scheduling obligations and the need to coordinate with clients as the basis for the delay. An extension should allow the government and its counsel sufficient time to meet the pending requests.

Respectfully submitted,

/s/ Deepak Gupta
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Attorneys for Plaintiffs

July 5, 2017

CERTIFICATE OF SERVICE

I hereby certify that on July 5, 2017, I filed this motion to extend the briefing schedule through this Court's CM/ECF system, which will send a notice of electronic filing to all counsel required to be served.

/s/ Deepak Gupta

Deepak Gupta