

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

WOODHULL FREEDOM FOUNDATION,)
 et al.,)
)
 Plaintiffs,)
)
 vs.)
)
 UNITED STATES OF AMERICA and)
 JEFFERSON B. SESSIONS, in his official)
 capacity as ATTORNEY GENERAL OF THE)
 UNITED STATES,)
)
 Defendants.)
 _____)

Civil Action No. 18-01552 (RJL)

**DEFENDANTS’ UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
REPLY TO PLAINTIFFS’ OPPOSITION TO DEFENDANTS’ MOTION TO DISMISS**

Defendants, by and through undersigned counsel, move pursuant to Federal Rule of Civil Procedure 6(b)(1) for an enlargement of time until August 6, 2018, to file their reply to Plaintiffs’ opposition to Defendants’ motion to dismiss, and as grounds for this motion, state as follows.

1. This action for declaratory and injunctive relief challenging the constitutionality of the Allow States and Victims to Fight Online Sex Trafficking Act of 2017 (“FOSTA”) was filed by Plaintiffs on June 28, 2018. ECF No. 1. Concurrent with the filing of the Complaint Plaintiffs filed a Motion for Preliminary Injunction (ECF No. 5) seeking to enjoin any and all enforcement of FOSTA during the pendency of this case.

2. On July 12, 2018, Defendants filed a combined opposition to Plaintiffs’ motion for preliminary injunction and motion to dismiss Plaintiffs’ complaint. ECF No. 15 & 16.

3. On July 26, 2016, Plaintiffs filed their opposition to the motion to dismiss. ECF No. 19. Pursuant to Local Civil Rule 7(d), Defendants’ reply is due August 2, 2018.

4. The Court held a motion hearing on July 19, 2018, regarding Plaintiffs' motion for preliminary injunction. The docket notes that the parties may file supplemental pleadings within ten days of their receipt of the transcript of that hearing.

5. The parties each received a copy of the July 19th hearing transcript on Friday, July 27, 2018. Accordingly, the parties' supplemental briefs are due August 6, 2018.

6. Defendants anticipate significant overlap between the reply and the supplemental brief and prefer to file a single consolidated brief on August 6, 2018. Pursuant to Local Civil Rule 7(m), the parties conferred, and Plaintiff has no objection to Defendants' proposal to consolidate the pleadings and file on August 6th.

7. A proposed order is attached.

Dated: August 2, 2018

Respectfully submitted,

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