

**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’ CONSENT MOTION FOR EXTENSION OF TIME FOR PARTIES TO  
CONFER AND TO FILE JOINT MEET AND CONFER STATEMENT**

Defendants, by and through undersigned counsel, move pursuant to Federal Rule of Civil Procedure 6(b)(1) for an enlargement of time for the parties to comply with the meet and confer requirements set forth in the Court’s Case Management Order until 30 days after the Court rules on the pending motions. As grounds for this motion, Defendants state as follows:

1. On July 20, 2018, the Court issued its Case Management Order. ECF No. 18. The Order states that where, as here, a Rule 12(b) motion has already been filed, the parties are to confer within 30 days of the Order, *i.e.*, by August 20, 2018, and submit a Joint Meet and Confer Statement fourteen days following the meeting, *i.e.*, by September 4, 2018.

2. Currently before the Court are two fully briefed motions: Plaintiffs’ Motion for Preliminary Injunction (ECF No. 5) and Defendants’ Motion to Dismiss (ECF No. 16). Because Defendants’ Motion is potentially dispositive and Plaintiffs’ Motion may affect the parties’ litigation positions and the management of the case going forward, it is in the interests of judicial

and party efficiency and economy to extend the meet and confer deadlines while both motions are pending.

3. Discovery is not needed to oppose the pending motions and neither party would be prejudiced by a stay of the meet and confer requirements until the pending motions are resolved. *See, e.g., Labson v. 2200 M Street LLC*, No. 03-cv-207 (RJL), 2003 WL 24251643 (D.D.C. Sept. 29, 2003).

4. The parties conferred and Plaintiff consented to the requested relief.

5. A proposed order is attached.

Dated: August 14, 2018

Respectfully submitted,

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