

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS  
 BID PROTEST**

*****		
	*	
GOOGLE, INC.,	*	
	*	
Plaintiff,	*	No. 10-743C
	*	
and	*	(Judge Susan G. Braden)
	*	
ONIX NETWORKING CORPORATION,	*	
	*	
Plaintiff,	*	
v.	*	
	*	
THE UNITED STATES,	*	
	*	
Defendant,	*	
	*	
and,	*	
	*	
SOFTCHOICE CORPORATION,	*	
	*	
Intervenor-Defendant.	*	
	*	
*****		

**UNOPPOSED MOTION TO ENLARGE**

Pursuant to Rule 6(b) and 6.1 of the Rules of the United States Court of Federal Claims, defendant, the United States, respectfully requests a seven-day enlargement of time, through and including April 22, 2011, within which to file its reply to plaintiffs’ response to our motion to terminate the stay of proceedings, dissolve the court's preliminary injunction, and issue a schedule to resume briefing on the merits of the case (“plaintiffs’ opposition”). Currently, a reply to plaintiffs’ opposition is due on April 15, 2011. This is defendant’s first request for an enlargement of time for this purpose. The plaintiffs, through their respective counsel, have been contacted regarding this request and they do not object. Intervenor-defendant also does not

object to this motion, provided that the time for its reply to plaintiffs' opposition, currently due on April 15, 2011, is equally enlarged by seven days, to and including April 22, 2011. Defendant and plaintiffs' do not oppose the request by intervenor-defendant.

This enlargement is requested to provide the defendant sufficient time to respond to plaintiffs' opposition, which raises significant and complex legal arguments, and to permit sufficient time for supervisory review. Additionally, good cause exists for this request to enlarge the date upon which a reply to plaintiffs' opposition because undersigned counsel is actively litigating another bid protest, Three S Consulting v. United States, Fed. Cl. No. 10-583, before this Court and an appeal before United States Court of Appeals for the Federal Circuit, Mojarro v. United States, Fed. Cir. No. 2011-3079. Accordingly, although counsel for defendant has worked diligently on this matter, additional time is required to complete defendant's reply brief.

Defendant hopes this requested extension is not overly burdensome, and apologizes for any inconvenience this may cause the Court.

For the foregoing reasons, defendant respectfully requests a seven-day enlargement of time, through and including April 22, 2011, within which to file our reply to plaintiffs' opposition.

Respectfully submitted,

TONY WEST  
Assistant Attorney General

MICHAEL F. HERTZ  
Deputy Assistant Attorney General

s/ Kirk T. Manhardt  
KIRK T. MANHARDT  
Assistant Director

OF COUNSEL  
SHERYL RAKESTRAW  
Attorney Advisor  
Department of the Interior

s/ Christopher L. Krafchek  
CHRISTOPHER L. KRAFCHER  
Trial Attorney  
Commercial Litigation Branch  
Civil Division  
Department of Justice  
1100 L Street, N.W.  
Washington, D.C. 20005  
Tel: (202) 305-0041  
Fax: (202) 305-7644

April 13, 2011

Attorneys for Defendant

CERTIFICATE OF FILING

I hereby certify that on this 13<sup>th</sup> day of April, 2011, a copy of the foregoing “Unopposed Motion To Enlarge” was filed electronically. I understand that notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/Christopher L. Krafchek