

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

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GOOGLE, INC.,	*
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Plaintiff,	*
	*
and	*
	*
ONIX NETWORKING CORPORATION,	*
	*
Plaintiff,	*
v.	*
	*
THE UNITED STATES,	*
	*
Defendant,	*
	*
and,	*
	*
SOFTCHOICE CORPORATION,	*
	*
Defendant-intervenor.	*
	*

No. 10-743C  
  
(Judge Susan G. Braden)

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**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 four-day enlargement of time, through and including April 26, 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 22, 2011. This is defendant’s second request for an enlargement of time for this purpose. The plaintiffs and defendant-intervenor, through their respective counsel, have been contacted regarding this request and they do not object.

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. Additionally, undersigned counsel has been dealing with a cold all week. 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 four-day enlargement of time, through and including April 26, 2011, within which to file our reply to plaintiffs' opposition.

Respectfully submitted,

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Assistant Attorney General

MICHAEL F. HERTZ  
Deputy Assistant Attorney General

s/ Kirk T. Manhardt  
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April 22, 2011

Attorneys for Defendant

CERTIFICATE OF FILING

I hereby certify that on this 22<sup>nd</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