IN THE UNITED STATES COURT OF FEDERAL CLAIMS BID PROTEST

THE UNITED STATES,

Defendant, *

and,

SOFTCHOICE CORPORATION, *

Defendant-Intervenor. *

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 five-day enlargement of time, through and including June 15, 2011, within which to file its reply in support of our cross motion for judgment upon the administrative record and response to plaintiffs' restated motion for judgment on the refiled and updated administrative record ("reply"). Currently, our reply is due on June 10, 2011. This is defendant's first request for an enlargement of time for this purpose. Plaintiffs and defendant-intervenor do not object to this motion for an enlargement of time. This enlargement is requested to provide the defendant sufficient time to respond to plaintiffs' revised

motion, which raises significant and complex legal arguments, and to permit sufficient time for supervisory review. Moreover, 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 personal matters that have only recently been fully resolved. Accordingly, although counsel for defendant has worked diligently on this matter, additional time is required to complete defendant's reply brief.

Defendant apologizes for any inconvenience this may cause the Court.

For the foregoing reasons, defendant respectfully requests a five-day enlargement of time, through and including June 15, 2011, within which to file our reply to plaintiffs' revised motion.

Respectfully submitted,

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s/ <u>Kirk T. Manhardt</u> KIRK T. MANHARDT Assistant Director

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June 9, 2011 Attorneys for Defendant