

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA**

**HORNBECK OFFSHORE SERVICES,
LLC, et al.**

Plaintiffs,

v.

KENNETH LEE "KEN" SALAZAR, et al,

Defendants.

CIVIL ACTION No. 10-1663(F)(2)

SECTION F

JUDGE FELDMAN

**MAGISTRATE 2
MAGISTRATE WILKINSON**

**MEMORANDUM IN SUPPORT OF DEFENDANTS' CONSENT MOTION FOR
EXTENSION OF TIME TO FILE RESPONSE TO PLAINTIFFS' MOTION TO ENFORCE**

Defendants, Kenneth Lee Salazar, United States Department of the Interior, Michael Bromwich, and the Bureau of Ocean Energy Management, Regulation, and Enforcement, ("Defendants"), hereby file this Motion for Extension of Time to File Response to Plaintiffs' Motion to Enforce.

On August 1, 2010, this Court entered an order denying Defendants' Motion to Dismiss as Moot. Dkt. #165. On August 7, 2010 Plaintiffs filed a Motion to Enforce Preliminary Injunction, and noticed the hearing for September 22. Dkt. #167. Pursuant to Local Rule 7.5E, Defendants' Response to the Motion to Enforce is due September 14, 2010. In response to a partial remand order from the Fifth Circuit Court of Appeals, this Court submitted a supplemental record on September 3, 2010. (Dkt. #166). Pursuant to the Fifth Circuit's order, the parties are to submit supplemental briefing within 10 days of the district court's submission of the supplemental record. (Dkt. #156).

In a related proceeding pending before this Court, Ensco v. Salazar, Case No. 10-1941, the plaintiff filed its Motion for Partial Summary Judgment on August 5, 2010 (Ensco, Dkt. #20). Defendants lodged the Administrative Record with the Court on August 17, 2010 (Ensco, Dkt. #37), and Defendants filed their Response and Cross Motion for Partial Summary Judgment on August 26

(Enesco, Dkt. #42). Enesco filed a Motion to Compel additional documents on September 1, 2010 (Enesco, Dkt. #50), and Defendants' Response is due September 9, 2010. The hearing on Enesco's Motion for Partial Summary Judgment and Defendants' Cross-Motion for Partial Summary Judgment is set for September 22, 2010. (Enesco, Dkt. #29).

As a result of the time and resources required for Defendants to respond to the multiple ongoing related proceedings in this matter, in the Fifth Circuit Court of Appeals, and in the Enesco v. Salazar matter also pending before this Court, Defendants respectfully request an extension of time to 12:00 noon Central Time on September 16, 2010 to file their Response to Plaintiffs' Motion to Enforce. The requested extension will not prejudice the parties nor delay the proceedings on Plaintiffs' Motion to Enforce, as Defendants have not requested to continue the noticed hearing date of September 22, 2010. Defendants have consulted with counsel for Plaintiffs and Plaintiffs have indicated that they consent to the requested extension.

Respectfully submitted this 9th day of September, 2010.

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CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2010, I caused a copy of the foregoing to be served through the Court's CM/ECF System to all parties.

/s/Brian Collins
Brian Collins