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

DEFENDANTS' EX PARTE MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' MOTION FOR CIVIL CONTEMPT AND FOR AN AWARD OF ATTORNEY FEES

NOW INTO COURT, through undersigned counsel, come Defendants, Kenneth Lee Salazar, United States Department of the Interior, Michael R. Bromwich, and the Bureau of Ocean Energy Management, Regulation, and Enforcement, ("Defendants"), and respectfully move this court for an extension, by two days, of Defendants' deadline to file a response to Plaintiffs' motion for civil contempt and for attorney fees. The current hearing date for the motion is February 2, 2011, and therefore, pursuant to LR7.5E, Defendants deadline to file a response is January 25, 2011. Defendants respectfully request an extension of two days, until January 27, 2011, in which to file their response. The additional time is necessary because of competing priorities in related litigation, <u>Ensco Offshore Company v. Salazar</u>, 10-cv-1941, which have prevented the undersigned counsel from making meaningful progress on a response to the motion in this case. Defendants submit,

moreover, that the severity of Plaintiffs' accusations serve as additional grounds for ensuring that Defendants are afforded a full opportunity to submit a meaningful response.

Defendants conferred with the Plaintiffs prior to filing this motion, and Plaintiffs have indicated that they will oppose the motion for the reasons stated in the accompanying memorandum. Good cause exists for granting the requested two-day extension.

WHEREFORE, Defendants respectfully request that the Court grant Defendants' motion for a two-day extension of time in which to file a response to Plaintiffs' motion for civil contempt and for attorney fees.

Respectfully submitted this 24th day of January, 2011.

IGNACIA S. MORENO Assistant Attorney General U.S. Dept. of Justice Environment and Natural Resources Division

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CERTIFICATE OF SERVICE

I hereby certify that on January 24, 2011, I caused a copy of the foregoing to be served through the Court's CM/ECF System to all parties.

/s/Guillermo A. Montero____ Guillermo A. Montero