

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

DAN MCCALL,)
)
Plaintiff,)
)
v.)
)
NATIONAL SECURITY AGENCY,)
et al.,)
)
Defendants.)
 _____)

Civil No. PWG-13-3203

**CONSENT MOTION FOR EXTENSION OF TIME
TO FILE INITIAL RESPONSE TO COMPLAINT**

COME NOW Defendants National Security Agency and the U.S. Department of Homeland Security (collectively, “Defendants”), by and through their undersigned counsel, and hereby respectfully move with the consent of Plaintiff for an extension of time to file their initial response to the complaint, and in support whereof state as follows:

1. On October 29, 2013, Plaintiff Dan McCall (“Plaintiff”) filed a complaint against the Defendants seeking declaratory relief to permit him to market goods containing parodied forms of Defendants’ official seals. See Docket Entry No. 1.
2. Plaintiff served the complaint on Defendants. See Docket Entry No. 12. Defendant’s initial response to the complaint is currently due on or before January 6, 2014. Id.
3. The parties are currently in discussions to resolve the case in a manner that may pretermit the need for further litigation.
4. Accordingly, for good cause, Defendants respectfully request that the Court grant them a 45-day extension of time in which to make their initial response to the complaint. This will

afford the parties sufficient time to determine whether the matter can be resolved without the need for further litigation. This would make the Defendants' initial response due on or before February 18, 2014.

5. On December 23, 2013, undersigned counsel sent Plaintiff's counsel an email seeking his consent to the instant extension request. On December 24, 2013, Plaintiff's counsel indicated via return email his consent to this request.

WHEREFORE, based on the foregoing, and with the consent of the Plaintiff, Defendants respectfully request that the Court grant this motion and extend the time for the Defendants' initial response to the complaint to February 18, 2014.

Respectfully submitted,

Rod J. Rosenstein
United States Attorney

By: _____/s/_____
Jason D. Medinger (Bar No. 28470)
Assistant United States Attorney
36 South Charles Street
Fourth Floor
Baltimore, Maryland 21201
(410) 209-4800