

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

AARON TOBEY,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:11cv154-HEH
)	
JANET NAPOLITANO, <i>et al.</i>)	
)	
Defendants.)	

**DEFENDANTS CAPITAL REGION AIRPORT COMMISSION,
VICTOR WILLIAMS, AND CALVIN VANN'S,
UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE RESPONSIVE PLEADINGS**

Defendants, Capital Region Airport Commission (“CRAC”), Victor Williams (“Williams”), and Calvin Vann (“Vann”), by counsel, and pursuant to Local Civil Rule 7(F)(2) of the Eastern District of Virginia, respectfully file this motion for an extension of time to file their responsive pleadings to the Complaint.

In support of this motion CRAC, Williams, and Vann state as follows:

1. Aaron Tobey (“Tobey”) filed his Complaint in this action on or about March 10, 2011.
2. CRAC was served with the Complaint and Summons on or about March 16, 2011, making its responsive pleadings thereto due on or about April 6, 2011.
3. Williams was served with the Complaint and Summons on or about March 15, 2011, making his responsive pleadings thereto due on or about April 5, 2011.
4. Vann was served with the Complaint and Summons on or about March 15, 2011, making his responsive pleadings thereto due on or about April 5, 2011.

5. Upon information and belief, those other Defendants that are affiliated with the federal government have their responsive pleadings due on or about May 15, 2011.

6. CRAC, Williams and Vann seek an extension up to and including May 15, 2011, to prepare and file their responsive pleadings simultaneously with the other Defendants.

7. Counsel for Tobey has confirmed that they do not oppose this motion.

8. A Consent Order providing for this extension is attached as Exhibit A. The parties will file an endorsed copy of the Consent Order with the Court.

WHEREFORE, for the foregoing reasons, CRAC, Williams and Vann respectfully request that the Court grant their motion and grant them an extension of time to up to and including May 15, 2011, to file their responsive pleadings.

Respectfully submitted,

CAPITAL REGION AIRPORT COMMISSION,
VICTOR WILLIAMS, and CALVIN VANN

By Counsel

/s/Belinda D. Jones

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**Counsel for Defendants Capital Region Airport Commission,
Victor Williams and Calvin Vann**

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of March, 2011, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record, including:

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