

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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TOM G. PALMER, <i>et al.</i>	)	)	
	)	)	
Plaintiffs,	)	)	
	)	)	
v.	)	)	Civil Action No. 09-01482 (FJS)
	)	)	
DISTRICT OF COLUMBIA, <i>et al.</i> ,	)	)	
	)	)	
Defendants.	)	)	
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DEFENDANTS’ CONSENT MOTION FOR EXTENSION OF TIME

Pursuant to Fed. R. Civ. P. 6(b)(1) and 7(b), defendants the District of Columbia and Metropolitan Police Chief Cathy Lanier move this Honorable Court to briefly enlarge the time for the defendants to file their Reply from August 11, 2014 to August 18, 2014. The defendants’ Memorandum of Points and Authorities in support hereof is attached hereto and incorporated by reference herein. A proposed Order is also attached hereto.

Pursuant to LCvR 7(m), the undersigned discussed the subject motion with opposing counsel, who consented to the relief requested herein.

WHEREFORE, the defendants respectfully request that this Honorable Court:

- A. Grant the defendants’ Consent Motion for Extension of Time; and
- B. Grant the defendants such other and further relief as the nature of their cause may require.

DATE: July 29, 2014

Respectfully submitted,

IRVIN B. NATHAN  
Attorney General for the District of Columbia

ELLEN A. EFROS  
Deputy Attorney General  
Public Interest Division

/s/ Grace Graham

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MEMORANDUM OF POINTS AND AUTHORITIES  
IN SUPPORT OF  
DEFENDANTS’ CONSENT MOTION FOR EXTENSION OF TIME

Defendants the District of Columbia and Cathy Lanier (collectively, “the District”), by and through undersigned counsel, respectfully submit this Memorandum of Points and Authorities in Support of their Consent Motion for Extension of Time, pursuant to Fed. R. Civ. P. 6(b)(1) and 7(b). A proposed Order is attached hereto.

In support of the instant motion, and for their good cause shown, the defendants state as follows:

1. On July 29, 2014, the Court issued an Order (Doc. No. 53) granting in part the defendants’ partial unopposed motion to stay pending appeal (Doc. No. 52). The Court directed the plaintiffs to file their opposition to the defendants’ motion on or before August 4, 2014, and directed the defendants to file a reply in further support of their motion for a stay pending appeal on or before August 11, 2014. *See* Order at 2–3.

2. Fed. R. Civ. P. 6(b)(1) permits an enlargement of time, such as that requested herein, “if a request is made, before the original time or its extension expires . . .” for good cause.

3. The District avers that undersigned counsel will be out of the country on August 11, 2014, not returning to the office until August 14, 2014, and the brief enlargement sought here is necessary to prepare a suitable Reply.

4. This enlargement is not sought for any improper purpose, but to complete an appropriate submission for consideration by this Court. No party will be prejudiced, and the brief extension requested here will have no effect on any other deadlines. Indeed, the Court has stayed the matter for 90 days. Moreover, opposing counsel has consented to the relief requested herein.

5. Based on the above, the District respectfully requests that this Honorable Court enter an order pursuant to Fed. R. Civ. P. 6(b)(1), to amend the schedule such that the defendants' Reply is due on or before August 18, 2014.

DATE: July 28, 2014

Respectfully submitted,

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