

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

RYAN NOAH SHAPIRO and
JASON LEOPOLD,

Plaintiffs,

v.

DEPARTMENT OF JUSTICE,

Defendant.

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Case No. 1:13-cv-1139 (RBW)

**DEFENDANT’S MOTION FOR EXTENSION OF TIME RESPOND
TO PLAINTIFF’S MOTION FOR PARTIAL SUMMARY JUDGMENT AND TO
ANSWER OR OTHERWISE RESPOND TO PLAINTIFFS’ COMPLAINT**

Defendant, by and through the undersigned Assistant United States Attorney, hereby moves under Fed. R. Civ. P. 6(b) for an extension of time until September 9, 2013, to respond to Plaintiffs’ Motion for Partial Summary Judgment, and to answer or otherwise respond to Plaintiffs’ complaint; and states the following in support.

1. On July 26, 2013, Plaintiffs filed their complaint seeking relief under the Freedom of Information Act (FOIA) with respect to two FOIA requests submitted to the FBI. On July 31, 2013, Plaintiffs moved for partial summary judgment with respect to their request for expedited processing of their FOIA requests. Defendant’s response to the motion for partial summary judgment is due August 12, 2013, and Defendant’s response to the complaint is due August 30, 2013.

2. As a matter of judicial economy, Defendant seeks to file responses to the complaint and motion simultaneously. The FBI has completed its search for potentially responsive records and expects to finish processing the records by September 9. Additionally,

4. Good cause exists here. The brief extension sought will allow the FBI to complete processing, which would moot Plaintiff's Motion for Partial Summary Judgment. Additionally, the additional time will allow Defendant to prepare the appropriate responses to be prepared and filed. The requested extension will not unduly delay adjudication of this action.

Wherefore, for the foregoing reasons, Defendant respectfully requests that the deadlines for responding to Plaintiffs' Complaint and Motion for Partial Summary Judgment be extended until September 9, 2013. Per Local Civ. R. 7(c), a proposed order is attached.

By: /s/
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