

Nos. 19-1081(L), 19-1083

**In the United States Court of Appeals
for the Federal Circuit**

NATIONAL VETERANS LEGAL SERVICES PROGRAM,
NATIONAL CONSUMER LAW CENTER, and ALLIANCE FOR JUSTICE,
for themselves and all others similarly situated,
Plaintiffs-Appellants,

v.

UNITED STATES OF AMERICA,
Cross-Appellant.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA
CASE NO. 1:16-745-ESH (THE HON. ELLEN S. HUVELLE)

**UNOPPOSED MOTION FOR AN EXTENSION
OF TIME TO FILE APPELLANTS' RESPONSE AND REPLY BRIEF**

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Counsel for Plaintiffs-Appellants National Veterans Legal Services Program, et al.

May 13, 2019

The plaintiffs-appellants/cross-appellees respectfully request a 45-day extension of time within which to file their response and reply brief, from May 28, 2019, to July 12, 2019. There is good cause for this request, as follows:

1. Counsel with primary responsibility for drafting the brief, Deepak Gupta, Jonathan E. Taylor, and other attorneys at Gupta Wessler, have several pressing obligations that have taken up and will continue to take up substantial time over the next month. These obligations include:

- A reply brief due on May 22 in *Bullock v. Internal Revenue Service*, No. 4:18-cv-103 (D. Mont.);
- A brief in opposition due May 23 in *Perryman v. Romero*, No. 18-1074 (U.S. S. Ct.);
- An intervention motion to be filed by May 17 and a brief due on May 31 in *Doris Behr Trust v. Johnson & Johnson*, No. 3:19-cv-8828 (D.N.J);
- An oral argument on June 5 in *Bullock v. Internal Revenue Service*, No. 4:18-cv-103 (D. Mont.);
- A brief due on June 5 in *Titus v. ZestFinance*, Nos. 18-35940 and 18-35943 (9th Cir.);
- A brief due on June 17 in *Alig v. Quicken Loans*, No. 19-1059 (4th Cir.);
- A brief due on June 19 in *Adeli v. Silverstar*, Nos. 19-1481 and 19-1602 (8th Cir.);

- A brief due on June 21 in *Harris v. Union Pacific*, No. 19-1514 (8th Cir.);
and
- A brief in opposition due on June 24 in *BNSF Railway Co. v. Montana Eighth Judicial District Court*, No. 18-1246 (U.S. S. Ct.).

2. Counsel for the cross-appellants, Alisa Klein, has consented to the relief requested in this motion.

For the foregoing reasons, the unopposed motion for a 45-day extension of time to file the plaintiffs-appellants' brief should be granted through July 12, 2019.

Respectfully submitted,

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May 13, 2019

Counsel for Plaintiffs-Appellants

CERTIFICATE OF COMPLIANCE

This motion complies with the type-volume limitation of Federal Rule of Appellate Procedure 32(g)(1) because it contains 281 words, excluding the parts exempted by Rule 32(f). This motion complies with the typeface requirements of Rule 32(a)(5) and the type-style requirements of Rule 32(a)(6) because it has been prepared in proportionally spaced typeface using Microsoft Word 2016 in 14-point Baskerville font.

CERTIFICATE OF SERVICE

I hereby certify that on May 13, 2019, I electronically filed the foregoing motion with the Clerk of the Court for the U.S. Court of Appeals for the Federal Circuit by using the CM/ECF system. All participants have consented to service by electronic mail:

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