

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

NATIONAL VETERANS LEGAL)
SERVICES PROGRAM, et al.,)
)
Plaintiffs,)
)
v.) Civil Action No. 16-745 ESH
)
UNITED STATES OF AMERICA,)
)
Defendant.)
)
)
_____)

UNOPPOSED MOTION FOR AN ENLARGEMENT OF TIME,
AND MEMORANDUM IN SUPPORT THEREOF

Defendant hereby moves, pursuant to Fed. R. Civ. P. 6(b)(1), for an enlargement of time of six business days to reply to Plaintiffs' opposition to the pending Motion To Dismiss Or, In The Alternative, For Summary Judgment. This would make the response due on August 16, 2016. Counsel for Plaintiffs, William H. Narwold, Esq., has agreed to the requested enlargement of time.

Defendant seeks this additional time because his responsibilities in several other matters have made it impossible to complete the needed reply by the current due date of August 8, 2016. Counsel has been working to complete a lengthy dispositive motion in another case involving individual capacity claims against federal employees of two federal agencies. At the same time, he has been preparing two other dispositive motions (one of which involves

classified information), both of which are also due on the date that the reply is currently due in this action, Monday, August 8, 2016.

For these reasons, Defendant asks for an enlargement of time to file a reply in the case up to and including August 16, 2016. A proposed order accompanies this motion.

Respectfully submitted,

CHANNING D. PHILLIPS, DC Bar #415793
United States Attorney

DANIEL F. VAN HORN, DC Bar #924092
Chief, Civil Division

By: _____ /s/
W. MARK NEBEKER, DC Bar #396739
Assistant United States Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that service of the foregoing Unopposed Motion For An Enlargement Of Time, And Memorandum In Support Thereof, and a proposed Order has been made through the Court's electronic transmission facilities on this 4th day of August, 2016.

/s/
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