

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

NATIONAL VETERANS LEGAL
SERVICES, et al.,

Plaintiffs,

v.

UNITED STATES OF AMERICA

Defendant.

Civil Action No. 16-745 (ESH)

DEFENDANT'S CONSENT MOTION TO CONTINUE MOTIONS HEARING

Pursuant to Federal Rule of Civil Procedure 6(b), Defendant, by and through the undersigned counsel, respectfully moves this Court to continue the Motions Hearing currently scheduled for March 19, 2018 at 11:00 a.m. *See* Min. Order (Feb. 27, 2018). In accordance with Local Civil Rule 7(m), the undersigned has conferred with Plaintiffs' counsel, who stated that Plaintiffs consent to the relief requested in this Motion.

There is good cause to grant the relief requested in this Motion:

1. The Parties completed briefing their cross-motions for summary judgment on January 5, 2018. On February 27, 2018, this Court scheduled a Motions Hearing for March 19, 2018, at 11:00 a.m. *See* Min. Order (Feb. 27, 2018).
2. Unfortunately, this Motions Hearing conflicts with long-scheduled international travel on the part of AUSA Field, who will be presenting arguments on Defendant's behalf.¹

¹ Specifically, AUSA Field will have just returned from an extended international trip late in the evening of March 17 and the current schedule will significantly hinder his ability to prepare.

3. The Parties have conferred and are available to participate in the Motions Hearing on any of the following dates: April 19, May 2–3, 10–11, 14, 17, 21–25.²

4. Accordingly, Defendant respectfully requests that the Court continue the Motions Hearing to a later date when the undersigned will be available to attend. There are no other pending deadlines or court dates that this request for a continuance would affect.

March 1, 2018

Respectfully submitted,

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² These dates take into account several additional scheduling conflicts, including an upcoming jury trial, medical procedure, travel, and depositions that cannot be rescheduled without substantial prejudice to witnesses.