

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

ELECTRONIC PRIVACY INFORMATION

CENTER

*Plaintiff,*

v.

U.S. DEPARTMENT OF DEFENSE,

*Defendant.*

Civil Action No. 14-cv-1555 (TSC)

**CONSENT MOTION FOR EXTENSION OF TIME**

Pursuant to Fed. R. Civ. P. 6(b), Defendant respectfully moves the Court to modify the April 9, 2015 Scheduling Order by extending all deadlines by 30 days. The parties conferred under Local Rule 7(m) and counsel for Plaintiff consented to this request.

There is good cause for the Court to modify the Scheduling Order in this Freedom of Information Act (FOIA) case. Since the last enlargement of time request, the agency has released to the Plaintiff previously withheld documents. As a result, counsel for the parties recently had preliminary discussions on resolving this case informally, without further litigation. Indeed, the parties are scheduling to confer in the next two weeks to discuss resolution of this case. The parties anticipate one or more rounds of discussions before any resolution could be reached. Alternatively, in the event that the parties cannot settle this case, the parties will submit dispositive motions by the deadlines proposed herein.

For the foregoing reasons, Defendant respectfully requests that the Court modify the April 9, 2105 Scheduling Order as follows:

Events	Current Dates	"Requested" Dates
Defendant's Motion for Summary Judgment (with <i>Vaughn</i> Index and/or Declaration)	May 29, 2015	June 29, 2015
Plaintiff's Opposition/Cross-Motion for Summary Judgment	July 1, 2015	August 1, 2015
Defendant's Reply/Opposition	July 15, 2015	August 15, 2015
Plaintiff's Reply	July 30, 2015	August 30, 2015

May 27, 2105

Respectfully submitted,

VINCENT H. COHEN, JR.  
 D.C. BAR # 471489  
 Acting United States Attorney

DANIEL F. VAN HORN  
 D.C. BAR # 924092  
 Chief, Civil Division

By: \_\_\_\_\_//s\_\_\_\_\_  
 JOHN C. TRUONG  
 D.C. BAR #465901  
 Assistant United States Attorney  
 555 4th Street, N.W.  
 Washington, D.C. 20530  
 Tel: (202) 252-2524  
 Fax: (202) 252-2599  
 E-mail: John.Truong@usdoj.gov

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

<p>ELECTRONIC PRIVACY INFORMATION CENTER</p> <p style="text-align: center;"><i>Plaintiff,</i></p> <p style="text-align: center;">v.</p> <p>U.S. DEPARTMENT OF DEFENSE,</p> <p style="text-align: center;"><i>Defendant.</i></p>
---

Civil Action No. 14-cv-1555 (TSC)

**[PROPOSED] ORDER**

Upon consideration of Defendant's Consent Motion to Modify Scheduling Order and the entire record herein, it is this \_\_\_\_\_ day of \_\_\_\_\_, 2015,

**ORDERED** that Defendant's Consent Motion to Modify Scheduling Order be and is hereby **GRANTED**; and it is

**FURTHER ORDERED** that the April 9, 2015 Scheduling Order be and is hereby **MODIFIED** as follows:

Events	Dates
Defendant's Motion for Summary Judgment (with <i>Vaughn</i> Index and/or Declaration)	June 29, 2015
Plaintiff's Opposition/Cross-Motion for Summary Judgment	August 1, 2015
Defendant's Reply/Opposition	August 15, 2015
Plaintiff's Reply	August 30, 2015

SO ORDERED.

\_\_\_\_\_  
United States District Judge