

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ELECTRONIC PRIVACY INFORMATION CENTER,)	
)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 17-410 (KBJ)
)	
U.S. DEPARTMENT OF JUSTICE,)	
)	
)	
Defendant.)	

**CONSENT MOTION FOR EXTENSION OF TIME TO PRODUCE
REMAINING RECORDS RESPONSIVE TO FOIA REQUEST**

Defendant, by counsel, hereby moves for an extension of the deadline for production of all remaining non-exempt records responsive to plaintiff’s FOIA request from September 15, 2017 to October 15, 2017. This motion is merited for the following reasons:

1. Pursuant to the production schedule in the Court’s July 11, 2017 minute order, “DOJ shall produce all non-exempt records responsive (sic) Plaintiff’s FOIA request, or otherwise respond to that portion of Plaintiff’s request, on or before September 15, 2017”.
2. While finalizing its review of material responsive to Plaintiff’s FOIA request, Defendant located five additional custodians in the Office of Legal Policy whose emails needed to be searched.
3. In addition, since proposing the September 15, 2017 date for finalizing production of responsive documents, Defendant has experienced an increase in its current

litigation caseload, including multiple cases seeking preliminary injunctions, as well as multiple pending production deadlines.

4. For the above reasons, Defendant will require additional time to finalize processing and production of documents in this case.
5. This is the first extension Defendant has requested of the deadlines for production set in the Court's July 11, 2017 minute order. Defendant also requested one extension of time for the filing of its Answer to the Complaint in this case. Plaintiff has not requested any extensions of time.
6. The only existing deadline that would be affected by the requested extension would be the September 29, 2017 due date for the parties' joint status report and proposed schedule for further proceedings, if necessary. Defendant moves for the Court to extend that deadline from September 29, 2017 to October 27, 2017.
7. Counsel for defendant contacted counsel for plaintiff in accordance with LCvR 7(m), and counsel for plaintiff consents to the relief sought in this motion.
8. Granting the relief sought in this motion would be in the interest of justice as well as the efficient resolution of this case, and would not prejudice either party.

Wherefore, defendant moves for this Court to extend the deadline for production of all remaining non-exempt records responsive to plaintiff's FOIA request from September 15, 2017 to October 15, 2017.

Respectfully submitted,

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

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

_____/s/_____
ALEXANDER D. SHOAIBI, D.C. Bar #423587
Assistant United States Attorney
555 Fourth Street, N.W.
Washington, D.C. 20530
(202) 252-2511
Alexander.D.Shoaibi@usdoj.gov

Counsel for Defendant