

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

_____)	
ELECTRONIC PRIVACY)	
INFORMATION CENTER,)	
)	
Plaintiff,)	
)	
v.)	
)	Case No. 17-cv-0163 RC
OFFICE OF THE DIRECTOR)	
OF NATIONAL INTELLIGENCE)	
)	
Defendant.)	
_____)	

**DEFENDANT’S CONSENT MOTION FOR ENLARGEMENT OF TIME TO
FILE MOTION FOR SUMMARY JUDGMENT**

Defendant, by and through undersigned counsel, respectfully moves this Court pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) for a five-day enlargement of time to, and including, June 26, 2017, to file its Motion for Summary Judgment in this action brought under the Freedom of Information Act (“FOIA”). This is Defendant’s second request to extend the deadline to file its motion for summary judgment, and this request would affect the current briefing schedule by extending the other filing deadlines each by five days. This request is made in good faith and with good cause, as set forth below.

1. On May 17, 2017, this Court entered a Scheduling Minute Order adopting the Joint Status Report and Proposed Order filed by the parties. The Minute Order provided that Defendant shall file its motion for summary judgment on or before June 19, 2017; Plaintiff shall file any cross-motion or opposition on or before July 18, 2017;

Defendant shall file any opposition or reply on or before August 7, 2017; and Plaintiff shall file any reply on or before August 22, 2017.

2. On June 16, 2017, Defendant filed a consent motion to extend the deadline to file its motion for summary judgment, and the other deadlines in the briefing schedule, by two days. ECF No. 15. The Court granted that motion. *See* Minute Order (June 16, 2017).

3. Unforeseen circumstances have arisen necessitating a brief extension until Monday, June 26, 2017 to finalize the declaration in support of the motion for summary judgment.

4. Pursuant to Local Rule 7(m), undersigned counsel has conferred with the Plaintiff, through counsel, and Plaintiff consents to the relief requested in this motion. A proposed order granting this motion is attached.

WHEREFORE, Defendant requests that the Court grant this motion for an enlargement of time, and enter the proposed order filed concurrently herewith, which provides that Defendant shall file its motion for summary judgment on or before June 26, 2017; Plaintiff shall file any cross-motion and opposition on or before July 25, 2017; Defendant shall file any opposition and reply on or before August 14, 2017; and Plaintiff shall file any reply on or before August 29, 2017.

Dated: June 21, 2017

Respectfully submitted,

CHAD A. READLER
Acting Assistant Attorney General

MARCIA BERMAN
Assistant Branch Director

/s/ Jennie L. Kneedler

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