

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ELECTRONIC PRIVACY)	
INFORMATION CENTER,)	Case No. 1:17-cv-00670-JEB
)	
Plaintiff,)	
)	
v.)	
)	
INTERNAL REVENUE SERVICE,)	
)	
Defendant.)	
_____)	

INTERNAL REVENUE SERVICE’S MOTION FOR EXTENSION OF TIME

COMES NOW Defendant Internal Revenue Service (the “Service”), and respectfully requests that the Court extend the time for the Service to answer or otherwise respond to Plaintiff’s complaint, for a period of 45 days, up to and including Wednesday, July 5, 2017. In support thereof, the Service submits the following:

1. Under Fed. R. Civ. P. 6(b)(1)(A), the Court may extend the time to act “for good cause” if a request is made before the original time to act expires.
2. Currently, Defendant’s responsive pleading is due on May 22, 2017.
3. Good cause exists in this case to extend the time for the Service to answer or otherwise respond to Plaintiff’s complaint. The undersigned counsel has reached out to the agency client, and the client is diligently gathering the information needed to answer the complaint. However, the client is unable to obtain all of the necessary information and transmit it to the undersigned attorney in time for her to knowledgably respond to the complaint either on, or even soon after, May 22, 2017.

4. Counsel for Defendant contacted counsel for Plaintiff on May 16, 2017 regarding this motion. Plaintiff does not consent to any extension of time.

Dated: May 17, 2017

DAVID A. HUBBERT
Acting Assistant Attorney General

/s/ Kieran O. Carter
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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of May, 2017, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

Counsel for Plaintiff

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