

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

|   |   |                        |
|---|---|------------------------|
| _____                                   | ) |                        |
| ACCURACY IN MEDIA, INC. <i>et al.</i> , | ) |                        |
|   | ) |                        |
| Plaintiffs,                             | ) |                        |
|   | ) |                        |
| v.                                      | ) |                        |
|   | ) | Case No. 14-1589 (EGS) |
| DEPARTMENT OF DEFENSE <i>et al.</i> ,   | ) |                        |
|   | ) |                        |
| Defendants.                             | ) |                        |
| _____                                   | ) |                        |

**DEFENDANT DEPARTMENT OF JUSTICE’S UNOPPOSED MOTION FOR ONE-WEEK  
EXTENSION OF TIME TO RESPOND TO MOTION FOR PARTIAL SUMMARY JUDGMENT**

Defendant Department of Justice (“DOJ”), by and through undersigned counsel, hereby moves for a one-week extension of time to respond to Plaintiffs’ Motion for Partial Summary Judgment. (ECF No. 25). Plaintiffs consent to the requested extension.

This is Defendant DOJ’s first request for an extension of time in this case. Defendant DOJ states that this unopposed motion is supported by good cause as follows:

1. On March 23, 2015, the parties submitted their Joint Proposed Scheduling Order to the Court. (ECF No. 20-1). The parties proposed that Plaintiffs file their Motion for Partial Summary Judgment against Defendant DOJ on Issue of Disclosure of Three Federal Bureau of Investigation (“FBI”) Interviews on or before May 8, 2015, and that DOJ file its opposition on or before May 29, 2015. To date, the Court has not entered a scheduling order governing the deadlines in this case.

2. On May 13, 2015 – five days after the parties’ proposed date – Plaintiffs filed their Motion for Partial Summary Judgment. (ECF No. 25). Pursuant to Local Civil Rule 7(b)

and Federal Rule of Civil Procedure 6(d), Defendant DOJ's opposition to the motion, if any, is due June 1, 2015.

3. Counsel at the FBI who is working on this matter will be out of the office from May 27, 2015, through June 3, 2015. The assistance of this attorney is essential for the preparation of a thorough and accurate response to Plaintiffs' Motion. Defendant DOJ therefore requests that the Court extend its deadline to file a responsive brief one week, until June 8, 2015.

4. This is the first extension that Defendant DOJ has requested in this case. The Court has not scheduled any other deadlines or hearings in this case, so the requested extension will have no other effects on the current schedule of this case. If granted the extension, Defendant DOJ will file its Opposition to Plaintiffs' Motion for Partial Summary Judgment or before June 8, 2015.

5. Plaintiffs consent to this motion.

6. A proposed order is attached.

Dated: May 14, 2015

Respectfully submitted,

BENJAMIN C. MIZER  
Acting Assistant Attorney General

ELIZABETH J. SHAPIRO  
Deputy Branch Director

s/ Megan A. Crowley  
MEGAN A. CROWLEY  
N.Y. Bar No. 4930376  
Trial Attorney  
United States Department of Justice  
Civil Division, Federal Programs Branch  
20 Massachusetts Avenue NW, Room 7221  
Washington, D.C. 20001  
Email: [megan.a.crowley@usdoj.gov](mailto:megan.a.crowley@usdoj.gov)  
Telephone: (202) 305-0754

Fax: (202) 616-8470

*Attorneys for Defendant Department of Justice*