

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

ACCURACY IN MEDIA, <i>et al.</i>	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action No. 14-1589 (EGS)
	)	
UNITED STATES DEPARTMENT OF	)	
DEFENSE, <i>et al.</i>	)	
	)	
Defendants.	)	
	)	

**CONSENT MOTION FOR EXTENSION OF TIME**

On March 5, 2018, the parties to this Freedom of Information Act (“FOIA”) suit<sup>1</sup> filed a Joint Status Report, advising the Court regarding the issues that remain to be litigated in this case, *see* Joint Status Report at 3-6, ECF No. 65 (Mar. 5, 2018), and requesting that the Court amend the parties’ briefing schedule to allow them sufficient time to brief the specified issues. *See id.* at 3. Pursuant to the current briefing schedule, Defendants are required to file their summary judgment motion on May 4, 2018. *See* Minute Order (Apr. 15, 2018).

With this motion, Defendants respectfully request a brief five-day extension of time, *i.e.*, from May 4, 2018, until May 10, 2018, to file their opening summary judgment brief. Counsel for Defendants realizes that the Court’s standing order required this motion to be filed two days sooner, *see* Standing Order Governing Civil Cases Before Judge

---

<sup>1</sup> Plaintiffs brought this FOIA action against Defendants, the Central Intelligence Agency (“CIA”), the United States Department of Defense and several of its component departments, the Department of State, and the United States Department of Justice and its component, the Federal Bureau of Investigation (collectively, “Defendants”). *See generally* Compl., ECF No. 1 (Sept. 19, 2014).

Emmet G. Sullivan ¶ 11, and sincerely apologizes for failing to comply with this requirement. Counsel for Defendants respectfully submits that extenuating circumstances exist that merit granting this request for a brief extension of time. Specifically, Defendants' counsel is unexpectedly taking care of a sick family member and will likely be out of the office for the remainder of this week and thus unable to finalize and coordinate the filing of Defendants' summary judgment motion and accompanying declarations and exhibits.

On May 3, 2018, pursuant to Local Civil Rule 7, Defendants' counsel conferred with Plaintiffs' counsel regarding Defendants' request for an extension of time. Plaintiffs' counsel graciously consented to this request and have requested that the time for filing their cross-motion for summary judgment be extended one week, *i.e.*, from June 8, 2018, to and including June 15, 2018. Defendants consent to Plaintiffs' request. The parties' remaining deadlines would remain the same.

Accordingly, Defendants respectfully request that the Court grant Defendants a brief five-day extension of time, *i.e.*, from May 4, 2018, until May 10, 2018, to file their motion for summary judgment and in turn grant Plaintiffs a one-week extension, *i.e.*, from June 8, 2018, until June 15, 2018, to file Plaintiffs' cross-motion for summary judgment.

A proposed order is attached to this motion.

Dated: May 3, 2018

Respectfully submitted,

CHAD A. READLER  
Acting Assistant Attorney General

ELIZABETH J. SHAPIRO  
Deputy Branch Director

/s/ Tamra T. Moore  
TAMRA T. MOORE  
District of Columbia Bar No. 488392  
Trial Attorney

United States Department of Justice  
Civil Division, Federal Programs Branch  
20 Massachusetts Avenue, Room 5375  
Washington, DC 20001  
Tel: (202) 305-8628  
Fax: (202) 305-8517  
E-mail: [tamra.moore@usdoj.gov](mailto:tamra.moore@usdoj.gov)  
Attorneys for Defendants