

**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 AND  
TO AMEND BRIEFING SCHEDULE**

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. On March 7, 2018, the Court granted the parties’ request to amend the briefing schedule and entered a briefing schedule pursuant to which Defendants’ opening brief currently is due on April 20, 2018. *See* Minute Order (Mar. 7, 2018).

With this motion, Defendants respectfully request a short two-week extension of time, *i.e.*, from April 20, 2018, until May 4, 2018, to file their opening summary judgment

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<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).

brief. Good cause exists to grant this request. Counsel for Defendants unexpectedly has a series of medical appointments over the next week, which will have her out of the office for several hours over several days next week.

On March 12, 2018, pursuant to Local Civil Rule 7, Defendants' counsel conferred with Plaintiffs' counsel regarding Defendants' request for an extension of time. Plaintiffs' counsel stated that Plaintiffs consent to the request and also requested (and Defendants consented to) an additional week to file Plaintiffs' cross-motion for summary judgment and opposition to Defendants' summary judgment motion.

Accordingly, Defendants respectfully request that the Court grant their extension motion and amend the summary judgment briefing schedule as follows, which takes into account counsels' respective scheduling issues over the next couple of months:

- May 4, 2018: Defendants file their motion for summary judgment;
- June 8, 2018: Plaintiffs file their opposition to Defendants' motion for summary judgment and cross-motion for summary judgment;
- July 13, 2018: Defendants file their reply in support of their motion for summary judgment and in opposition to Plaintiffs' cross-motion for summary judgment; and
- August 10, 2018: Plaintiffs file their reply in support of their cross-motion for summary judgment.

A proposed order is attached to this motion.

Dated: April 13, 2018

Respectfully submitted,

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ELIZABETH J. SHAPIRO  
Deputy Branch Director

/s/ Tamra T. Moore

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