

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

ACCURACY IN MEDIA, et al.,

Plaintiffs,

v.

DEPARTMENT OF DEFENSE, et al.,

Defendants.

Case No. 14-1538 (EGS/DAR)

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFFS' OBJECTIONS TO THE MAGISTRATE'S
REPORT AND RECOMMENDATION**

Defendants respectfully request a one-month extension of time, up to and including November 9, 2020, to file their response to Plaintiffs' objections to the magistrate's report and recommendation. Plaintiffs do not oppose Defendants' requested relief. As good cause for this request, Defendants offer the following.

1. Plaintiffs filed a complaint in this Freedom of Information Act ("FOIA") case on September 19, 2014. ECF No. 1.
2. Defendants filed their motion for summary judgment on May 10, 2018. ECF No. 68. Plaintiffs filed their cross motion for summary judgment on June 25, 2018. ECF No. 71. The same day, Plaintiffs also filed a motion for leave to propound an interrogatory to the Department of Defense. *See* ECF No. 73. On January 7, 2019, the Court referred the case to a magistrate judge. *See* January 7, 2019 Minute Order. The case was assigned to Magistrate Judge Deborah Robinson.
3. Magistrate Judge Robinson issued her Report and Recommendation on August 27, 2020. ECF No. 83.

4. On September 9, 2020, Plaintiffs moved for an extension of time to file objections to the Report and Recommendation. Defendants did not oppose the motion, *see* ECF No. 85, and the Court granted Plaintiffs' extension, *see* Sept. 9, 2020 Minute Order. Plaintiffs filed their objections to the Report and Recommendation on September 23, 2020. ECF No. 87.

5. Defendants' current deadline to respond to Plaintiffs' objections is October 7, 2020. *See* L. Civ. R. 72.2(b); 7(b).

6. Defendants respectfully submit that they need additional time to respond to Plaintiffs' objections. This case was previously handled by a different attorney who has since left undersigned counsel's office. Undersigned counsel was not involved with summary judgment briefing in this case and requires additional time to become familiar with the pending issues. In addition, undersigned counsel has several deadlines in the next few weeks in other cases, and undersigned counsel also intends to take a short vacation around Columbus Day.

7. In light of the above, undersigned counsel requests a one-month extension to respond to Plaintiffs' objections, up to and including November 9, 2020. *See* Fed. R. Civ. P. 6(a)(1)(C).

8. Undersigned counsel has not previously requested any extension of time in this matter, and Defendants have not previously requested an extension of time to respond to Plaintiffs' objections.

9. Granting this motion will not affect any other pending deadlines.

10. Before filing this motion, pursuant to Local Civil Rule 7(m), undersigned counsel for Defendants conferred with counsel for Plaintiffs, who reported that Plaintiffs do not oppose the relief requested in this motion.

DATED: October 2, 2020

Respectfully submitted,

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/s/ Joshua C. Abbuhl
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