UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

BRIAN WRENN, *et al.*,	)	
Plaintiffs,	)	
v.	)	Civil Action No. 15-cv-00162 (FJS)
DISTRICT OF COLUMBIA, *et al.*,	)	
Defendants.	)	

CONSENT MOTION BY DEFENDANTS FOR
EXTENSION OF TIME

Pursuant to Fed. R. Civ. P. 6(b)(1) and 7(b), defendants, (collectively, "the District"), by and through undersigned counsel, respectfully seek an Order from this Court extending the time to respond to the Complaint in this matter.

Pursuant to LCvR 7(m), the undersigned counsel discussed the instant motion with opposing counsel, who consented to the relief requested herein.

WHEREFORE, the District respectfully requests that this Honorable Court:

A. Grant the District's Consent Motion for Extension of Time to respond to the Complaint to two (2) weeks after the Court decides plaintiffs' pending motion for preliminary injunction, and

B. Grant the District such other and further relief as the nature of its cause may require.

WHEREFORE, on good cause shown, the District requests that this relief be granted.

DATE: February 12, 2015

Respectfully submitted,

KARL A. RACINE
Attorney General for the District of Columbia

ELLEN A. EFROS
Deputy Attorney General
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/s/ Andrew J. Saindon
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FOR THE DISTRICT OF COLUMBIA

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DISTRICT OF COLUMBIA, *et al.*,	)	
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MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF DEFENDANTS' CONSENT MOTION FOR EXTENSION OF TIME

Defendants ("the District"), by and through undersigned counsel, respectfully submit this Memorandum of Points and Authorities in Support of their Consent Motion for Extension of Time, pursuant to Fed. R. Civ. P. 6(b)(1) and 7(b). A proposed Order is attached hereto.

In support of the instant motion, and for its good cause shown, the District states as follows:

1. On or about February 4, 2015, plaintiffs served the Complaint on the District.

2. Pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i), the District's answer or other response to the Complaint is due on or before February 25, 2015.

3. Plaintiffs filed their Motion for Preliminary Injunction on February 6, 2015, and sought expedited consideration. Later that day, the Court directed the District to respond to the Motion by February 20, 2015.

4. Fed. R. Civ. P. 6(b)(1) permits an enlargement of time, such as that requested herein, "if a request is made, before the original time or its extension expires . . ." for good cause.

5. For its good cause, the District states that the Court's decision on the pending Motion for Preliminary Injunction will greatly influence the form and content of the District's response to the Complaint.

6. This enlargement is not sought for any improper purpose, but to complete an appropriate submission for consideration by this Court. No party will be prejudiced, and the brief extension requested here will have no effect on any other deadlines. Moreover, opposing counsel has consented to the relief requested herein.

7. Based on the above, the District respectfully requests that this Honorable Court enter an order pursuant to Fed. R. Civ. P. 6(b)(1), for an extension of time such that the District's answer or other response to the Complaint is due on or before two (2) weeks after the date of the Court's decision on plaintiffs' Motion for Preliminary Injunction.

DATE: February 12, 2015

Respectfully submitted,

KARL A. RACINE
Attorney General for the District of Columbia

ELLEN A. EFROS
Deputy Attorney General
Public Interest Division

/s/ Andrew J. Saindon
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