

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

CITIZENS FOR RESPONSIBILITY AND)
 ETHICS IN WASHINGTON)
 1400 Eye Street, N.W., Suite 450,)
 Washington, DC 20005)
)
 Plaintiff,)
)
 v.)
)
 U.S. DEPARTMENT OF HOMELAND)
 SECURITY)
 Washington, DC 20528)
)
 Defendant.)

CIVIL ACTION NO.
1:09-1101 (EGS)

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO FIRST AMENDED COMPLAINT**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, defendant U.S. Department of Homeland Security respectfully moves the Court for an enlargement of time of seven days, up to and including Monday, August 24, 2009, within which to respond to Plaintiff’s First Amended Complaint. Defendant seeks this brief extension of time in light of the good faith efforts that are being made by the White House and Plaintiff to informally resolve the issues in this case. The extension of time requested herein will allow this process to continue.

Pursuant to Local Civil Rule 7(m), prior to filing this motion, the undersigned contacted Plaintiff’s counsel, who represented that Plaintiff agrees to an extension of one week.

Defendant accordingly requests that the Court grant this motion and extend the time to respond to plaintiff's First Amended Complaint to August 24, 2009.

Dated: August 17, 2009

Respectfully submitted,

TONY WEST
Assistant Attorney General

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Assistant Branch Director

/s/ Lynn Y. Lee
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