

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

**STEPHEN DEARTH and SECOND
AMENDMENT FOUNDATION, INC.,**

Plaintiffs,

vs.

**ERIC H. HOLDER, Jr., Attorney General
of the United States,**

Defendant.

Case No. 09-cv-0587-RLW

**DEFENDANT'S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE CLOSING BRIEF**

Defendant hereby moves for an extension of time up to and including Wednesday, February 1, 2012, in which to file his combined opposition brief to Plaintiffs' motion for summary judgment and reply brief in support of Defendant's cross-motion for summary judgment. The current deadline is Thursday, January 19, 2012. Plaintiffs' counsel has consented to the extension of time.

In support of this motion, Defendant states as follows:

Defendant requires additional time because Defendant's combined opposition/reply brief must be coordinated with various components of the United States Department of Justice, and because of the press of business and scheduling conflicts (including a substantive motion due just after the current deadline for Defendant's closing brief). This motion will not prejudice any party to the case, and is not sought merely for delay but in order that justice may be served.

Based on the foregoing, Defendant respectfully requests that his motion for an extension of time be granted. A proposed order is attached hereto.

Dated: January 11, 2012

Respectfully submitted,

TONY WEST
Assistant Attorney General

RONALD MACHEN
United States Attorney

SANDRA M. SCHRAIBMAN
Assistant Branch Director
U.S. Department of Justice
Civil Division, Federal Programs Branch

/s/ Daniel Riess

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