

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

PAUL BURKE,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 16-CV-825 (CRC)
	)	
U.S. DEPARTMENT OF HEALTH	)	
AND HUMAN SERVICES,	)	
	)	
Defendant.	)	
_____	)	

**DEFENDANT’S UNOPPOSED MOTION TO EXTEND TIME  
TO FILE RESPONSE TO PLAINTIFF’S COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b)(1), Defendant moves for an extension of time to July 8, 2016 to file a response to Plaintiff’s complaint in this Freedom of Information Act case.

In support of the instant motion, Defendant states as follows:

1. On May 3, 2016, Plaintiff filed his complaint. ECF No. 1.
2. Defendant’s current deadline for filing its response to the complaint is June 9, 2016.
3. In order to avoid unnecessarily placing this case in an active litigation posture,

Defendant hereby moves to extend the time for Defendant to file a response to Plaintiff’s complaint until July 8, 2016.

4. Defendant anticipates that this case will become moot within the next week or two.
5. This is the first extension that Defendant has sought in this case.
6. There are no other deadlines in this case. Thus, the requested extension will not impact any deadlines.

7. This request for an extension is being made in good faith and not for purposes of delay. Plaintiff, who does not object to this extension, will not be prejudiced by the extension requested herein.

WHEREFORE, Defendant respectfully requests that the Court extend its time to file a response to the complaint until July 8, 2016. A proposed order is attached.

Dated: June 8, 2016

Respectfully submitted,

CHANNING D. PHILLIPS, D.C. Bar #415793  
United States Attorney for the District of Columbia

DANIEL F. VAN HORN, D.C. Bar # 924092  
Chief, Civil Division

By: /s/ Marsha W. Yee

MARSHA W. YEE

Assistant United States Attorney

Civil Division

555 4th Street, N.W.

Washington, D.C. 20530

Telephone: (202) 252-2539

Facsimile: (202) 252-2599

Email: Marsha.Yee@usdoj.gov

*Counsel for Defendants*

