

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

NATIONAL ASSOCIATION OF CRIMINAL DEFENSE  
LAWYERS,

*Plaintiff,*

v.

FEDERAL BUREAU OF INVESTIGATION, *et al.*,

*Defendants.*

Civ. A. No. 18-cv-2399 (KBJ)

**CONSENT MOTION FOR EXTENSION OF TIME  
TO RESPOND TO THE AMENDED COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b), the Federal Bureau of Prisons (“BOP”) and United States Department of Justice (“DOJ”) (“Defendants”), by and through counsel, respectfully moves for an additional 30 days, to and including January 14, 2019, to answer or otherwise respond to Plaintiff’s Amended Complaint in this Freedom of Information Act (“FOIA”) matter.

The requested extension will not affect any other deadline in this case.

In support of this Motion, the Defendants state as follows:

1. On November 18, 2018, Plaintiff filed an Amended Complaint in this matter, seeking injunctive and other relief to compel the release of agency records related to the alleged federal government’s collection and monitoring of emails between inmates held in BOP facilities and their attorneys. ECF No. 9.

2. Currently, the Defendants’ response to the Plaintiff’s Amended Complaint is due today, December 14, 2018.

3. Previous counsel for the Defendants has become unable to prepare a response to the Amended Complaint because of an extremely serious health issue that has afflicted a very close family member. As a result, previously counsel has been called away from the office on short notice and without an ability to plan in advance for his absence.

4. To assist previous counsel, undersigned counsel assumed representation of the Defendants yesterday, but needs the additional time to get acquainted with the matter and to prepare and finalize a responsive pleading.

5. Pursuant to Local Civil Rule 7(m), counsel for the Defendants contacted counsel to discuss this Motion and the reasons for an extension of time. Undersigned counsel was informed by Plaintiff's counsel that Plaintiff consents to the relief requested.

Wherefore, for the reasons set forth above, the Defendants respectfully request that the Court grant Defendants an additional 30 days, to and including January 14, 2019, to answer or otherwise respond to Plaintiff's Amended Complaint.

Respectfully submitted,

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Civ. Action No. 18-cv-2399 (KBJ)

**ORDER**

Upon consideration of Defendants' Consent Motion for an Extension of Time to Respond to the Amended Complaint, the fact that Plaintiff consent thereto, and the entire record in this case; it is this \_\_\_\_\_ day of December 2018, hereby

ORDERED, that the Defendants' Motion is hereby GRANTED, and it is further

ORDERED, that the Defendants shall answer or otherwise respond to the Amended Complaint on or before January 14, 2019.

\_\_\_\_\_  
KETANJI BROWN JACKSON  
UNITED STATES DISTRICT JUDGE