

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
No. 20-mc-00082 (PJS/TNL)

IN THE MATTER OF THE APPLICATION
OF THE REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS TO UNSEAL
CERTAIN SEARCH WARRANT
MATERIALS,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

**AGREED REQUEST TO
EXTEND TIME TO
RESPOND TO PETITION**

The Respondent, by and through its attorneys, Erica H. MacDonald, United States Attorney for the District of Minnesota, and David W. Fuller, Assistant United States Attorney, hereby requests the Court to Extend the Time to Respond until February 19, 2021. The following good cause supports this request:

1. The response is currently due on Wednesday, January 20, 2021. *See* December 28, 2020 Order (Doc. No. 13). The undersigned counsel recently became involved in this matter and has been, and is, busy with numerous other filings.
2. Thirty additional days should be sufficient to review and compile pertinent evidence and prepare a response that is thorough and useful to the Court.
3. The undersigned counsel conferred with Petitioners' counsel on January 12, 2021 via email. Petitioners' counsel Megan responded to indicate her agreement

and to suggest March 22, 2021 as a reply deadline, with which the government agrees.

4. This is Respondent's first request for an extension of time; the request is not being submitted for purposes of delay.
5. A proposed order is being submitted along with this request.

Dated: January 13, 2021

ERICA H. MacDONALD
United States Attorney

s/ David W. Fuller

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