

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Adam Steele, Brittany Montrois, and)
Joseph Henchman, on behalf of)
themselves and all others similarly)
situated,)
Plaintiffs,)
)
v.)
)
United States of America,)
Defendant.)
_____)

Civil Action No.: 1:14-cv-01523-RCL

PLAINTIFFS’ UNOPPOSED MOTION FOR EXTENSION OF TIME

Pursuant to Fed. R. Civ. P. 6(b)(1), Plaintiffs Adam Steele, Brittany Montrois, and Joseph Henchman (“Plaintiffs”) respectfully move the Court, through their undersigned counsel, for a one-week extension of time to reply to Defendant’s Opposition to Motion for Partial Final Judgment Under Rule 54(b), ECF No. 229, and Defendant’s Opposition to Motion for Clarification, ECF No. 230, filed with this Court on March 31, 2023. Plaintiffs have conferred with the United States regarding this motion as required by Local Rule 7(m). The United States consents to the motion.

Rule 6(b)(1)(A) states “[w]hen an act may or must be done within a specified time, the court may, for good cause, extend the time. . . if a request is made, before the original time. . . expires.” Fed. R. Civ. P. 6(b)(1)(A); *Sherrod v. Breitbart*, 720 F.3d 932, 938 (D.C. Cir. 2013) (“Rule 6(b) gives district courts wide discretion to modify the time limits set forth in the rules.”). “[R]equests for extensions of short duration are routine in this district.” *Jordan v. U.S. Dep’t of*

Just., 315 F. Supp. 3d 584, 594 (D.D.C. 2018) (internal citation and quotation marks omitted); *see also Nyambal v. AlliedBarton Sec. Servs. LLC*, 2021 WL 6773003, at *2 (D.D.C. Aug. 13, 2021).

Ms. Oliver who was the principal author of the motions and briefs is on a family vacation from March 31, 2023 to April 8, 2023, and a brief extension is necessary to prepare appropriate replies to the United States' responses. *See Jordan v. U.S. Dep't of Labor*, 308 F. Supp. 3d 24, 37 (D.D.C. 2018) (“[F]aced with a routine motion for an extension of a short duration based on a prearranged vacation and the press of business. . . the Court easily granted the motion. . . .”). The United States will not be prejudiced by the extension requested and the extension will not affect any other deadlines.

Plaintiffs respectfully request the Court grant their motion and grant an extension of time up to and including April 14, 2023. A proposed Order providing for this extension is submitted with this motion.

Dated: April 3, 2023

Respectfully submitted,

/s/ William H. Narwold
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Additional Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on April 3, 2023, I electronically filed Plaintiffs' Unopposed Motion for Extension of Time through this Court's CM/ECF system. I understand that notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

Dated: April 3, 2023

/s/ William H. Narwold

William H. Narwold