

[NOT YET SCHEDULED FOR ORAL ARGUMENT]

IN THE UNITED STATES COURT OF APPEALS
FOR THE D.C. CIRCUIT

JOHN SOLOMON,
Plaintiff-Appellant,

v.

PAMELA BONDI, in her official capacity as
Attorney General of the United States; U.S.
DEPARTMENT OF JUSTICE; COLLEEN
JOY SHOGAN, in her capacity as Archivist
of the United States; and NATIONAL
ARCHIVES AND RECORDS
ADMINISTRATION,

Defendants-Appellees.

No. 24-5236

**CONSENT MOTION FOR A 30-DAY EXTENSION OF TIME TO
FILE RESPONSE BRIEF**

For the reasons that follow, the government respectfully moves the
Court for a 30-day extension of time, to and including Wednesday, April
16, 2025, within which to file its response brief in this case. Appellant

consents to this motion. In support of this motion, Defendants-Appellees state the following:

1. Appellant filed his opening brief on January 15, 2025. The government's response brief is currently due March 17, 2025. The government previously requested and received one 30-day extension of the time to file its response. No oral argument date has been set.

2. The requested extension is necessary to allow the government adequate time to prepare its response, as well as to ensure time for new Department of Justice leadership to familiarize itself with the issues in this case.

Jennifer Utrecht is the attorney with principal responsibility for preparing the government's brief in this case. Ms. Utrecht is also lead counsel in several other appellate matters with recent and upcoming deadlines, including *Baylor All Saints Med. Ctr. v. Kennedy*, No. 24-10934 (5th Cir.) (reply brief due March 14, 2025, extension request until March 21, 2025 pending); *Warren v. Department of Labor*, No. 24-13505 (11th Cir.) (response brief due April 4, 2025, as extended); and is responsible for

assisting the Office of the Solicitor General with preparing and filing the Respondent's Brief in *Soto v. United States*, No. 24-320 (S. Ct.) (brief due April 2, 2025; oral argument scheduled April 28, 2025).

In addition, due to the recent change in administration on January 20, 2025, the Department of Justice has new leadership. The extension is thus necessary to provide new leadership with sufficient time to familiarize themselves with the issues in this case and determine how they wish to proceed, including determining whether this case may be resolved without further litigation. In light of this, the government respectfully requests a 30-day extension of time, to and including Wednesday, April 16, 2025, to prepare the response brief.

3. Counsel for the appellant has represented that he consents to this motion.

CONCLUSION

For the foregoing reasons, we respectfully ask that the Court extend the filing date for the government's response brief by 30 days, to and including Wednesday, April 16, 2025.

Respectfully submitted,

GERARD SINZDAK

/s/ Jennifer L. Utrecht

JENNIFER L. UTRECHT

Attorneys

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MARCH 2025

CERTIFICATE OF COMPLIANCE

Pursuant to Federal Rule of Appellate Procedure 32(g)(1), I hereby certify that this motion complies with Federal Rule of Appellate Procedure 27(d)(1)(E) because it was prepared with Palatino Linotype 14-point, a proportionally spaced font with serifs, and the motion complies with Federal Rule of Appellate Procedure 27(d)(2) because it contains 379 words, according to the word count of Microsoft Word.

/s/ Jennifer L. Utrecht

JENNIFER L. UTRECHT

CERTIFICATE OF SERVICE

I hereby certify that on March 10, 2025, I electronically filed the foregoing with the Clerk of the Court by using the appellate CM/ECF system. Participants in the case are registered CM/ECF users, and service will be accomplished by the appellate CM/ECF system.

/s/ Jennifer L. Utrecht

Jennifer L. Utrecht