UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

DIANE J. SCHROER, Plaintiff, v. JAMES H. BILLINGTON, Librarian of Congress, Defendant.	No. 05-cv-1090 (JR)

JOINT MOTION TO ESTABLISH BRIEFING SCHEDULE REGARDING DEFENDANT'S MOTION TO DISMISS

On August 1, 2005, defendant filed a motion to dismiss the complaint. Pursuant to the local civil rules, plaintiff's opposition to defendant's motion would be due on Friday, August 12, 2005, and defendant's reply would be due on Friday, August 19, 2005.

In light of the potentially dispositive nature of defendant's motion, plaintiff's counsel called defendant's counsel to request additional time to file their opposition. After conferring about the schedules of the various attorneys participating in the case, defendant agreed to plaintiff's proposal that plaintiff's opposition be filed by Tuesday, September 27, 2005. This deadline reflects the fact that a senior lawyer on plaintiff's legal team will be traveling out of the country and unreachable until the third week of September. Likewise, plaintiff has consented to defendant's request for a deadline of Friday, October 21, 2005, to file their reply memorandum.

The complaint and the motion to dismiss raise complicated issues, some of which are matters of first impression in this circuit. For this reason, the parties jointly move for additional time to prepare their briefing in this matter.

A proposed order granting the relief requested is attached.

Respectfully submitted,

/s/ Sharon M. McGowan
Sharon M. McGowan (D.C. Bar No. 476417)
Kenneth Y. Choe
American Civil Liberties Union Foundation
125 Broad Street
New York, NY 10004
(212) 549-2627

Arthur B. Spitzer (D.C. Bar No. 235960)
American Civil Liberties Union
of the National Capital Area
1400 20th Street, N.W. #119
Washington, D.C. 20036
(202) 457-0800

Counsel for Plaintiff

August 2, 2005

UNITED STATES DISTRICT COURT
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DIANE J. SCHROER,

Plaintiff,

v.

JAMES H. BILLINGTON,
Librarian of Congress,

Defendant.

No. 05-cv-1090 (JR)

ORDER

Upon consideration of the parties' Joint Motion to Establish Briefing Schedule Regarding Defendant's Motion to Dismiss and finding good cause therefor, it is hereby

ORDERED that Plaintiff shall file her Opposition to Defendant's Motion to Dismiss by Tuesday, September 27, 2005; and it is further

ORDERED that Defendant shall file his Reply by Friday, October 21, 2005.

August ____, 2005

James Robertson
United States District Judge