

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

CENTER FOR BIOLOGICAL DIVERSITY,
et al.,

Plaintiffs,

v.

KIRSTJEN M. NIELSEN,
in her official capacity as Secretary of the U.S.
Department of Homeland Security, *et al.*,

Defendants.

Case No.: 1:18-cv-00655-KBJ

**DEFENDANTS' SECOND MOTION FOR AN ENLARGEMENT OF TIME TO FILE
THEIR REPLY MEMORANDUM IN SUPPORT OF THEIR MOTION TO DISMISS**

Pursuant to Federal Rule of Civil Procedure 6(b), Defendants hereby respectfully move for a second enlargement of time of seven days, up to and including Friday, August 10, 2018, within which to file their Reply Memorandum in Support of Defendants' Motion to Dismiss. In accordance with Local Rule 7(m), the undersigned counsel has conferred with counsel for the Plaintiffs, who represent that they will take no position on this motion.

Defendants move for this enlargement of time due to the emergent necessity to assign new counsel to this case on behalf of the government. That counsel, who has familiarity with the issues before the Court, is in trial for the remainder of this week in another case also before this same United States District Court, and will accordingly not be able to turn his attention to the case at bar until this coming weekend. Although counsel will work as expeditiously as possible, Defendants anticipate that they will need up to and including Friday, August 10, within which to prepare and file their Reply Memorandum.

Defendants assure the Court that they bring this motion only out of necessity owing to wholly unforeseen events. Defendants deeply regret the delay that results from this request for a second enlargement of time, and also sincerely regret any inconvenience to Plaintiffs or the Court that might arise from this request.

CONCLUSION

For the foregoing reasons, Defendants respectfully request that they be given until Friday, August 10, 2018, within which to file their reply memorandum in support of their motion to dismiss.

Dated: August 2, 2018

Respectfully submitted,

CHAD READLER
Acting Assistant Attorney General

/s/ John R. Tyler

JOHN R. TYLER (D.C. Bar. No. 297713)
Assistant Director
United States Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Ave. NW, Room 7154
Washington, D.C. 20530
Tel: (202) 514-2356 / Fax: (202) 616-8460
John.Tyler@usdoj.gov

Counsel for Defendants

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[PROPOSED] ORDER

Upon consideration of Defendants' Second Motion for an Enlargement of Time to File their Reply Memorandum in support of their Motion to Dismiss, and for good cause shown, it **HEREBY ORDERED** that Defendants' motion is granted, whereby Defendants have up to and including Friday, August 10, 2018, within which to file their Reply Memorandum.

IT IS SO ORDERED.

Date: _____

KETANJI BROWN JACKSON
United States District Judge