

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

**IN THE MATTER OF THE APPLICATION
OF WP COMPANY LLC**

Misc. Action No. 19-0032 (ABJ)

JOINT MOTION FOR EXTENSION OF TIME

The United States of America and Paul Manafort respectfully submit this joint motion for an extension of time in which to respond to the Court’s minute order of March 3, 2020. In support of this motion, the parties state the following:

On January 6, 2020, the Court directed that the government and Mr. Manafort “submit a joint filing by March 6, 2020, identifying any records requested by the petitioner that can be unredacted in part or entirely, setting forth the basis for any continued redactions, and describing any points of disagreement between the government and Manafort on these matters.” 1/6/2020 Minute Order.

On March 3, 2020, the Court granted the parties’ previous joint motion for an extension of time (ECF No. 15) in which to consult with one another and make the determinations ordered by the Court regarding the records requested by the petitioner, setting a new deadline of May 6, 2020. 3/3/2020 Minute Order.

In the interim, counsel for the government has continued consultation with other components in the Department of Justice, and the government and counsel for Mr. Manafort have continued to review the records at issue to determine which redactions can be removed from the materials requested by petitioner—a process that is nearly complete.

However, as a result of the COVID-19 pandemic and the need to access voluminous records and perform all consultations remotely, the parties have found that finalizing the review and consultation process is taking longer than expected.

Therefore, the government and Mr. Manafort respectfully request that this Court grant an extension of time of 30 days to submit the joint filing to the Court identifying records that can be lesser or entirely redacted, and describing any points of disagreement between the parties on these matters.

Respectfully submitted,

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