

**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 one final extension of time in which to respond to the Court's minute order of April 29, 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, and April 29, 2020, the Court granted the parties' previous joint motions for extensions of time (ECF No. 15 and ECF No. 16) in which to consult with one another and make the determinations ordered by the Court regarding the records requested by the petitioner; the current deadline is June 8, 2020. 3/3/2020 Minute Order; 4/29/2020 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. These consultations were complicated by the ongoing COVID-19 pandemic and the need to conduct these reviews and consultations remotely.

On May 29, 2020, the government provided counsel for Mr. Manafort with the last of the government's proposals for lesser-redacted materials. Counsel for Mr. Manafort is now considering the government's proposals, and the parties respectfully request additional time for counsel for Mr. Manafort to do so, and for the parties to confer and prepare the joint report for the Court.

Therefore, the government and Mr. Manafort respectfully request that this Court grant one final 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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