

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

DANIEL RICHMAN,

Petitioner-Movant

v.

UNITED STATES OF AMERICA,

Respondent.

Case No. 1:25-mc-00170-CKK

UNOPPOSED¹ MOTION TO EXTEND GOVERNMENT’S COMPLIANCE DEADLINE

Respondent, the United States of America, by and through the undersigned counsel, hereby moves this Court, pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, for an Order further extending the deadline by which the United States must certify its compliance with this Court’s December 12, 2025 Order (as clarified and modified), which is presently January 5, 2026. *See* ECF Nos. 20, 26, 27, 38, 41.

In the days since the Court last extended the foregoing deadline, the undersigned counsel has endeavored to negotiate in good faith with counsel for Petitioner-Movant the particulars of the parties’ understanding of what compliance with the Court’s Orders requires. For example, classified information cannot be deleted from the government’s forensic copy of electronic media without the destruction of the entire media. Thus, although the Court’s Orders, “permit the Government to permanently delete a single classified document from the material seized from

¹ Counsel for the Petitioner-Movant has advised the undersigned counsel that although Petitioner-Movant does not join in the request of the United States to extend instant compliance deadline, neither does Petitioner-Movant oppose the request of the United States. Counsel for the Petitioner-Movant further advised that Petitioner-Movant expressly requests that the United States continue to not access, share, disseminate, disclose, or otherwise transfer the materials covered by the Court’s Orders without leave of Court, to which request the United States does not object.

Petitioner Richman’s personal computer hard drive . . . from any of these materials before returning them to Petitioner Richman,” ECF No. 41 at 2, such limited deletion of classified information from a forensic image is not technologically feasible.

Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure provides that, “[w]hen an act may or must be done within a specified time, the court may, for good cause, extend the time . . . with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires.” Good cause exists to extend the deadline by which the United States must comply with the Court’s Order insofar as discussions between the parties continue that may alleviate the necessity of the Court spending judicial resources resolving any dispute concerning compliance with the Court’s Orders. *See* Fed. R. Civ. P. 6(b)(1)(A); *Nasreen v. Capitol Petroleum Group, LLC*, 2021 WL 5310565, at *4 (D.D.C. Nov. 15, 2021).

So that these discussions may continue, the United States respectfully requests the deadline to comply with the Court’s Order by providing a certification of compliance with the same be extended to January 12, 2026. The United States is not requesting any other modification or alteration to the Court’s Order (or the clarifications or modifications thereto).²

[SIGNATURE NEXT PAGE]

² Consistent with the Court’s orders, the Government delivered the single copy of Petitioner-Movant’s covered materials to the United States District Court for the Eastern District of Virginia on December 29, 2025.

Dated: January 2, 2026

Respectfully submitted,

/s/ Stanley E. Woodward, Jr.

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CERTIFICATE OF SERVICE

On January 2, 2026, the undersigned hereby certifies that a true and correct copy of the foregoing was electronically filed and served via the CM/ECF system, which will automatically send electronic notification of such filing to all registered parties.

/s/ Stanley E. Woodward, Jr.

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