UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

J6ERS WERE DESTROYED BY WEAPONIZATION, Petitioner, v. DON R. BERTHIAUME, in his official capacity as Inspector General of the United States Department of Justice, Respondent.	Civil Action No. 26-2082 (RDM)

RESPONDENT'S CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO THE FIRST AMENDED PETITION FOR WRIT OF MANDAMUS

Pursuant to Federal Rule of Civil Procedure 6(b), Respondent moves, by and through undersigned counsel, for an extension of the deadline to respond to the First Amended Petition for Writ of Mandamus ("Amended Petition"), ECF No. 14. Respondent respectfully requests that the response deadline be extended from the current deadline of November 2, 2026, to November 13, 2026. This is Respondent's first request to extend the deadline to respond to the Amended Petition. Pursuant to Local Civil Rule 7(m), undersigned counsel conferred with Petitioner's counsel prior to filing this motion, and Petitioner consents to the relief requested herein. Good cause supports this motion, as set forth below:

Undersigned counsel has been assigned a significantly large volume of cases with competing deadlines that have limited his ability to confer with agency counsel to prepare an appropriate response to the Amended Petition. Among his many responsibilities, this week alone, undersigned counsel is responsible for writing three motions to dismiss in three different cases.

This extension request takes into account existing deadlines in other cases during the requested extension period. Agency counsel also requires additional time to investigate the allegations of the Amended Petition. Accordingly, to afford undersigned counsel sufficient time to confer with agency counsel and prepare an appropriate response to the Amended Petition, Respondent respectfully requests an extension so that the new deadline for responding to the Amended Petition would be November 13, 2026.

The requested extension would not impact any other deadlines in this case. A proposed order is attached.

Dated: October 28, 2026

Respectfully submitted,

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J6ERS WERE DESTROYED BY WEAPONIZATION,

Petitioner,

v.

DON R. BERTHIAUME, in his official capacity as Inspector General of the United States Department of Justice,

Respondent.

Civil Action No. 26-2082 (RDM)

[PROPOSED] ORDER

Upon consideration of Respondent's Consent Motion for Extension of Time to Respond to the First Amended Petition for Writ of Mandamus ("Amended Petition"), and for good cause shown, it is hereby

ORDERED that Respondent's Motion is **GRANTED**; and it is

FURTHER ORDERED that Respondent's deadline to respond to the Amended Petition, ECF No. 14, is November 13, 2026.

SO ORDERED, this ___ day of _____, 2026.

RANDOLPH D. MOSS
United States District Judge