

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

JANE DOE 2, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, *et al.*,

Defendants.

Civil Action No. 17-cv-1597 (CKK)

**DEFENDANTS' CONSENT MOTION FOR EXTENSION OF TIME**

Defendants respectfully request an extension of time, to and including June 6, 2018, within which to file their reply briefs in support of Defendants' motions (ECF Nos. 115 & 116) to dissolve the preliminary injunction, to dismiss the complaint, and/or in the alternative for summary judgment and opposition to Plaintiffs' cross-motion for summary judgment (ECF No 131) and a corresponding extension to Plaintiffs' subsequent filing dates. Pursuant to Local Civil Rule 7(m), counsel for the parties have conferred, and all parties agree to the requested scheduling relief.

Good cause exists for an extension for the following reasons:

1. In addition to their opposition to Defendants' motions to dissolve the preliminary injunction, to dismiss the complaint, and/or in the alternative for summary judgment, Plaintiffs have filed a 45-page cross-motion for summary judgment with accompanying statements of fact and exhibits which contain new materials (including new declarations). Additional time is necessary to respond.

2. Defendants' lead counsel, Ryan Parker, is in the process of transitioning to another position outside of the Department of Justice and Defendants' new lead counsel, Andrew Carmichael, just returned from three weeks of military duty with the Navy Reserves. As such, and due to the demands of other related litigation, Defendants require additional time to effectively

prepare and file Defendants' reply briefs in support of Defendants' motions (ECF Nos. 115 & 116) and Defendants' opposition to Plaintiffs' cross-motion for summary judgment (ECF No. 131).

On that basis, Defendants propose the following modified briefing schedule to which Plaintiffs have agreed:

Defendants' reply in support of its motions to dissolve the preliminary injunction, to dismiss the complaint, and/or in the alternative for summary judgment and opposition to Plaintiffs' cross-motion for summary judgment.	June 6, 2018
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Plaintiffs' reply in support of cross-motion for summary judgment	June 22, 2018
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**CONCLUSION**

Granting the motion is in the interests of justice. Plaintiffs consent to the proposed change in the briefing schedule. The change does not prejudice any party. Accordingly, the Motion should be granted.

A proposed order is submitted herewith.

DATED: May 17, 2018

Respectfully submitted,

CHAD A. READLER  
Acting Assistant Attorney General  
Civil Division

BRETT A. SHUMATE  
Deputy Assistant Attorney General

JOHN R. GRIFFITHS  
Branch Director

ANTHONY J. COPPOLINO  
Deputy Director

*/s/ Andrew E. Carmichael*  
ANDREW E. CARMICHAEL  
Trial Attorney  
U.S. Department of Justice  
Civil Division, Federal Programs Branch  
20 Massachusetts Avenue NW  
Washington, DC 20530  
Tel: (202) 514-3346  
[Andrew.E.Carmichael@usdoj.gov](mailto:Andrew.E.Carmichael@usdoj.gov)

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**PROPOSED ORDER**

Upon consideration of Defendants' Consent Motion for Extension of Time, the Court hereby orders that the motion be GRANTED and the briefing schedule will be amended as follows:

Defendants' reply in support of motions to dissolve the preliminary injunction, to dismiss the complaint, and/or in the alternative for summary judgment and opposition to Plaintiffs' cross-motion for summary judgment.

June 6, 2018

Plaintiffs' reply in support of cross-motion for summary judgment

June 22, 2018

So ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2018.

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COLLEEN KOLLAR-KOTELLY  
U.S. DISTRICT JUDGE