

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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|--------------------------|---|-----------------------------------|
| AMERICAN CENTER |) | |
| FOR LAW AND JUSTICE, |) | |
| |) | |
| Plaintiff, |) | Civil Action No. 17-CV-1866 (APM) |
| |) | |
| v. |) | |
| |) | |
| UNITED STATES DEPARTMENT |) | |
| OF JUSTICE, |) | |
| |) | |
| Defendant. |) | |
| _____ |) | |

**UNOPPOSED MOTION TO VACATE REMAINDER
OF BRIEFING SCHEDULE AND TO STAY
SUMMARY JUDGMENT PROCEEDINGS**

Defendant moves to vacate the remainder of the briefing schedule and to stay summary judgment proceedings. In support of the instant motion, Defendant states as follows:

1. Defendant's deadline to file its combined reply and opposition to plaintiff's cross-motion for summary judgment is tomorrow, March 23, 2018. Minute Order dated Feb. 27, 2018.
2. The Federal Bureau of Investigation (the "FBI") has advised that it is conducting additional searches and needs additional time to complete its searches and to determine how much time it will need to process any responsive records. Second Declaration of David M. Hardy dated March 22, 2018.
3. Defendant thus asks the Court to vacate the remainder of the briefing schedule and to stay summary judgment proceedings for now to allow the FBI to complete this work. Defendant also asks that the Court permit it to file a status report on or before April 26, 2018, on the status of its searches.
4. This request is being made in good faith and not for purposes of delay.

5. In accordance with Local Civil Rule 7(m), the undersigned emailed plaintiff's counsel to ask for their position on this motion.

6. Plaintiff's counsel replied that they do not oppose this motion.

WHEREFORE, Defendant respectfully requests that the Court vacate the remainder of the briefing schedule, stay summary judgment proceedings and allow Defendant to file a status report on or before April 26, 2018, regarding the status of its searches. A proposed order is attached.

Date: March 22, 2018

Respectfully submitted,

JESSIE K. LIU, [REDACTED]
United States Attorney

DANIEL F. VAN HORN, [REDACTED]
Chief, Civil Division

By: /s/ Marsha W. Yee

MARSHA W. YEE
Assistant United States Attorney
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[REDACTED]

Counsel for Defendant