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

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| SAFARI CLUB INTERNATIONAL, et al. | ) | |
| | ) | |
| Plaintiffs, | ) | Civ. No. 14-cv-00670 (ABJ) |
| | ) | |
| v. | ) | |
| | ) | |
| SALLY M. R. JEWELL, et al. | ) | |
| | ) | |
| Defendants. | ) | |
| _____ | ) | |

**UNOPPOSED MOTION OF SAFARI CLUB INTERNATIONAL AND THE NATIONAL RIFLE ASSOCIATION OF AMERICA FOR EXTENSION OF TIME TO FILE REPLY BRIEF ON THEIR MOTION TO AMEND COMPLAINT**

Plaintiffs, Safari Club International and the National Rifle Association of America (SCI/NRA), move for an extension of time to file their reply to Federal Defendants' partial opposition (Dkt. 37) to SCI/NRA's Motion for Leave to File a Second Amended and Supplemented Complaint ("Motion to Amend") (Dkt. 34). Under the requested extension, SCI/NRA's reply would be due on September 5, 2014. In accordance with a briefing schedule previously established by this Court, SCI/NRA's opposition to Federal Defendants' supplement to their motion to dismiss ("Motion to Dismiss") is due on September 5, 2014. Minute Order of 6/23/2014. On August 8, 2014, Federal Defendants filed a combined Motion to Dismiss and opposition to SCI/NRA's Motion to Amend. SCI/NRA's reply to the partial opposition to their Motion to Amend is due on August 18, 2014. SCI/NRA seeks an extension so that they can respond to the Federal Defendants' August 8 filing in a single document – a combined reply on the Motion to Amend and opposition to the Motion to Dismiss.

Federal Defendants' Motion to Dismiss and partial opposition to the Motion to Amend concern the same legal issue – whether some of SCI/NRA's claims are futile. Consolidating the

briefing on these two motions will allow the parties and Court to expeditiously resolve the two related motions. The Court has broad discretion in how to resolve concurrently pending motions to amend and to dismiss. *See Hourani v. Mirtchev*, 282 F.R.D. 278, 279-80 (D.D.C. 2012) (court concurrently resolved plaintiff's motion to file amended complaint and defendant's motion to dismiss).

For these reasons, SCI/NRA seek to extend the schedule for the Motion to Amend in order to respond to Federal Defendants' arguments in a single document, filed on or before September 5, 2014. Federal Defendants' reply to SCI/NRA's opposition to Federal Defendants' supplemental motion to dismiss will remain due no later than September 19, 2014.

Counsel for Federal Defendants stated, via email to SCI's counsel on August 13, 2014, that Federal Defendants do not oppose the relief requested in this motion.

Dated: August 14, 2014

Respectfully submitted,

/s/ Anna M. Seidman

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