IN THE UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

DANIEL BINDERUP,

Plaintiff—Appellee – Cross-Appellant,

v.

Nos. 14-4549, 14-4550

ERIC H. HOLDER, JR., Attorney General of the United States; and B. TODD JONES, Director of the Bureau of Alcohol, Tobacco, Firearms and Explosives,

Defendants-Appellants - Cross-Appellees.

UNOPPOSED MOTION FOR EXTENSION OF TIME IN WHICH TO FILE BRIEF FOR APPELLEE

The government hereby moves for a 30-day extension of time, to and including June 3, 2015, to file its response and reply brief. Counsel for plaintiff has authorized us to indicate that this motion is unopposed.

- 1. Plaintiff's cross-appeal and response brief was filed on March 30, 2015. The government's response and reply brief would therefore be due on May 4, 2015. We have not previously sought an extension of this deadline.
- 3. Mr. Nemeroff, who formerly had primary responsibility for the case, is on paternity leave until mid-May. This case was therefore recently reassigned to Ms. Wright. The government respectfully requests a 30-day extension in light of Ms.

Wright's other litigation deadlines and administrative duties, and to allow her adequate time to become familiar with the case and prepare the government's brief.

4. Counsel for plaintiff has authorized us to represent that this motion is unopposed.

Respectfully submitted,

MICHAEL S. RAAB

s/ Abby C. Wright

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CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2015, I electronically filed the foregoing with the Clerk of the Court by using the appellate CM/ECF system. Participants in the case are registered CM/ECF users and service will be accomplished by the appellate CM/ECF system.

s/ Abby C. Wright
ABBY WRIGHT