

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION

GEORGIACARRY.ORG, INC.)	
And DAVID JAMES,)	
)	
Plaintiffs,)	CIVIL ACTION NO.
)	4:14-cv-00139-HLM
v.)	
)	
)	
THE U.S. ARMY CORPS OF)	
ENGINEERS,)	
and)	
JON J. CHYTKA, in his official)	
Capacity as Commander, Mobile)	
District of the US Army Corps of)	
Engineers,)	
)	
Defendants.)	

DEFENDANTS' UNOPPOSED MOTION FOR AN EXTENSION OF TIME

Pursuant to Federal Rule of Civil Procedure 6(b), Defendants the U.S. Army Corps of Engineers and Jon J. Chytka move for an order for an extension of time to file their opposition to Plaintiff's motion for a preliminary injunction (Dkt. 5) until July 14, 2014. Undersigned counsel states that she consulted with counsel for Plaintiffs, who indicated he did not oppose Defendants' request for an extension.

The extension is supported by good cause, as set forth in the accompanying memorandum, including the fact that the Department of Justice attorney assigned to this case is out of the country June 23- July 7, 2014. Accordingly, Defendants

respectfully request that their deadline for responding to Plaintiff's motion for a preliminary injunction be extended up to and including July 14, 2014.

Respectfully submitted,

SALLY QUILLIAN YATES
UNITED STATES ATTORNEY



s/ LORI M. BERANEK
LORI M. BERANEK
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OF COUNSEL

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CERTIFICATE OF SERVICE

I certify that, on July 2, 2014, I electronically filed the within and foregoing with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the parties' attorneys of record.

This 2d day of July, 2014.

A handwritten signature in cursive script, appearing to read "Lori M. Beranek", followed by a horizontal line.

/s/ Lori M. Beranek
LORI M. BERANEK
ASSISTANT U.S. ATTORNEY

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DEFENDANTS' MEMORANDUM IN SUPPORT
OF THEIR UNOPPOSED MOTION FOR AN EXTENSION OF TIME

Defendants the U.S. Army Corps of Engineers and Jon J. Chytka submit this memorandum in support of their motion for an extension of time to file their opposition to Plaintiffs' motion for a preliminary injunction (Dkt. 5) until July 14, 2014. In support of this motion, Defendants state as follows:

1. If calculated from the date of service on the United States Attorney's Office, Defendants' response to Plaintiffs' motion would be due by July 3, 2014.

2. This extension is supported by good cause, including the fact that the Department of Justice attorney assigned to this case is out of the country June 23-July 7, 2014.

3. In addition, although styled as an emergency motion, the issues raised in Plaintiffs' motion (related to a recent administrative action) can be addressed through an orderly briefing process that provides Defendants with the additional time they need to brief the issues for the Court.

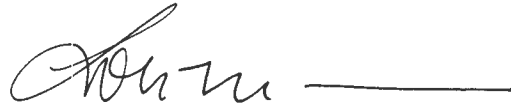
4. Undersigned counsel certifies that she consulted with counsel for Plaintiffs, who indicated he did not oppose Defendants' request for an extension.

5. The extension will not unduly delay the Court's consideration of Plaintiffs' motion.

Accordingly, Defendants respectfully request that their deadline for responding to Plaintiffs' motion for a preliminary injunction be extended up to and including July 14, 2014. A proposed order is attached for the Court's convenience.

Respectfully submitted,

SALLY QUILLIAN YATES
UNITED STATES ATTORNEY



s/ LORI M. BERANEK
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Defendants.)	

ORDER

Having read and considered the Defendants' Unopposed Motion for Extension of Time to file an opposition to Plaintiffs' Motion for Preliminary Injunction, and for good cause shown, it is hereby ORDERED that the Defendants shall be granted an extension of time to file their response, including any and all supporting documents related thereto, through and including July 14, 2014.

So ordered this ____ day of _____, 2014.

Harold L. Murphy
United States District Judge