

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

GREGORY T. ANGELO, *et al.*,

Plaintiffs,

v.

DISTRICT OF COLUMBIA, *et al.*,

Defendants.

Civil Action No. 1:22-cv-01878-RDM

DEFENDANT’S CONSENT MOTION TO MODIFY BRIEFING SCHEDULE

Defendants District of Columbia, Attorney General Brian L. Schwalb, and Chief Robert J. Contee III move under Rule 6(b)(1) and with Plaintiffs’ consent to modify the briefing schedule for Defendants’ forthcoming motion to dismiss. Rule 6(b)(1)(A) provides for extensions of time on a showing of good cause. By Minute Order dated February 7, 2023, the Court granted Defendants’ consent motion for extension of time [38] and set March 3, 2023, as the deadline for all Defendants to respond to Plaintiffs’ amended complaint. Defendants have prepared a dispositive motion in response to the amended complaint but, due to the complexities of the issues and the presence of Parties sued in their individual capacities, Defendants need an additional week—until March 10, 2023—to review and finalize that filing. Defendants submit that this constitutes good cause justifying the requested extension.

Plaintiffs consent and request an extension of time (to which Defendants’ consent) to April 14, 2023, to respond to Defendants’ dispositive motion. No party will suffer prejudice if the Court agrees and grants this Motion. And the proposed alteration of the schedule will neither affect other dates or deadlines nor materially delay resolution of the action. A brief memorandum and proposed order are attached.

Date: March 1, 2023.

Respectfully Submitted,

BRIAN L. SCHWALB
Attorney General for the District of Columbia

STEPHANIE E. LITOS
Interim Deputy Attorney General
Civil Litigation Division

/s/ Matthew R. Blecher

MATTHEW R. BLECHER [1012957]
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**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF
DEFENDANTS' CONSENT MOTION TO MODIFY BRIEFING SCHEDULE**

In support of Defendants' Consent Motion to Modify Briefing Schedule, Defendants submit the following:

1. Rule 6(b)(1) of the Federal Rules of Civil Procedure;
2. Defendants' showing of good cause, as stated in the Motion;
3. Plaintiffs' consent to the requested relief; and
4. The inherent power of the Court.

Date: March 1, 2023.

Respectfully Submitted,

BRIAN L. SCHWALB

Attorney General for the District of Columbia

STEPHANIE E. LITOS

Interim Deputy Attorney General

Civil Litigation Division

/s/ Matthew R. Blecher

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