

**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

**DEFENDANTS' CONSENT MOTION
FOR AN EXTENSION OF TIME TO REPLY**

Defendants move under Rules 6(b)(1)(A) for an extension of time to reply to Plaintiffs' Opposition to Motions to Dismiss [46]. Plaintiffs filed a combined opposition to the motion to dismiss filed by Chief Michael Anzallo [42] and the motion to dismiss filed by Defendants District of Columbia, Attorney General Brian L. Schwalb, and Chief Robert J. Contee III (District Defendants) [44]. Chief Anzallo and the District Defendants' deadline to reply is currently May 1, 2023; if this Motion is granted, the deadline will be May 12, 2023. Plaintiffs consent to this extension.

Rule 6(b)(1)(A) provides for extension of existing deadlines upon a showing of "good cause." Here, the additional time will allow Defendants sufficient time to fully respond to the arguments in Plaintiffs' 35-page opposition. Additional time is also necessary because of the competing professional obligations of Defendants' counsel. The proposed extension will not unduly delay the resolution of the matter or impact any other deadlines. A proposed order is attached.

Dated: April 25, 2023.

Respectfully Submitted,

/s/ Janice L. Cole

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**MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT OF DEFENDANTS'
CONSENT MOTION FOR EXTENSION OF TIME TO REPLY**

In support of Defendants' consent motion for an extension of time to respond to the Complaint, Defendants submit the following:

1. Rules 6(b)(1) and 7(b) of the Federal Rules of Civil Procedure;
2. Defendants' showing of good cause, as stated in the motion;
3. Plaintiffs' consent to the extension; and
4. The inherent power of the Court.

Dated: April 25, 2023.

/s/ Janice L. Cole

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ORDER

Upon consideration of Defendants' Consent Motion for extension of time to reply (Motion) and the entire record, it is **ORDERED** that:

- (1) The Motion is **GRANTED**; and
- (2) All Defendants shall reply to Plaintiffs' opposition by May 12, 2023.

SO ORDERED.

Date: _____

RANDOLPH D. MOSS
United States District Judge