

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JOHN H. PAGE,

Plaintiff,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States,

Defendant.

Civil Action No.: 20-0104 (CRC)

MOTION FOR EXTENSION OF TIME

Pursuant to Federal Rule of Civil Procedure 6(b), Defendant respectfully requests that the Court extend the answer deadline in this case by thirty days. Defendant's response is currently due by March 23, 2020. This is Defendant's first request to extend this deadline. Defendant conferred with *pro se* Plaintiff, who stated that he does not consent to the relief requested in this Motion.¹

There is good cause to grant this Motion. In this case, Plaintiff challenges whether Defendant "ha[s] any grounds for omitting Columbia [*i.e.*, the District of Columbia], a State of the Union, from the census for the purposes of apportioning participation in the Congressional franchise." Compl. ¶¶ 1, 34. Plaintiff filed his Complaint on January 15, 2020. *See* Compl. Defendant's response to the Complaint is currently due by March 23, 2020. Since being assigned to this case, the undersigned Assistant United States Attorney has been working to determine how the Government wishes to respond to the Complaint. That process, however, has been delayed by the press of other matters and will not be completed in time to file a response by March 23. Indeed,

¹ Specifically, *pro se* Plaintiff stated that he is "not willing to consent to a full month extension."

over the past several weeks, the undersigned has been required to devote substantial time to the pretrial process for a trial that was scheduled to start at the beginning of April. Earlier this week, that trial was continued to a later date in light of the current COVID-19 pandemic. Further complicating matters, schools in the D.C.-area have recently closed in light of the COVID-19 pandemic. Undersigned counsel must therefore balance ongoing work commitments in this and other litigation matters with dependent care responsibilities for the foreseeable future. In addition, the availability of Agency counsel and Agency employees who must be consulted on the response is limited as a result of the COVID-19 pandemic.

In light of the foregoing, Defendant will not be able to complete its response to Plaintiff's Complaint by March 23, 2020, and respectfully requests that the Court extend the response deadline by thirty days, to April 22, 2020.

March 19, 2020

Respectfully submitted,

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[PROPOSED] ORDER

Upon consideration of Defendant's motion for extension of time, and the entire record herein, it is hereby:

ORDERED that Defendant's motion is **GRANTED**; and it is

FURTHER ORDERED that Defendant's response to Plaintiff's Complaint shall be filed by April 22, 2020.

Date

United States District Judge