

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

DENISE NEMETH-GREENLEAF, *et al.*,
Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL
MANAGEMENT, *et al.*,
Defendants.

Case No. 1:25-cv-00407

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO
PLAINTIFFS' COMPLAINT**

Defendants respectfully move for a 21-day extension of time to file a response to Plaintiffs' Amended Complaint, from July 14, 2025, to August 4, 2025.

This extension request is necessary to ensure that the undersigned counsel has sufficient time to evaluate the complaint allegations, confer with their reviewer, and prepare an accurate and complete response. Defendants have been diligently preparing an amended motion to dismiss the amended complaint, which raises new issues and facts not addressed in earlier briefing. However, continued unexpected demands of other time-sensitive litigation matters handled by undersigned counsel have impeded their ability to complete an adequate response by the current deadline. In addition, undersigned counsel has planned annual leave on the current July 14, 2025 filing date. The requested 21-day extension should afford undersigned counsel the necessary time to complete their amended motion to dismiss and provide time for supervisory review.

On July 8, 2025, counsel for Defendants and counsel for Plaintiffs conferred about Defendants' extension request. Plaintiffs consent to the request.

Dated: July 10, 2025

Respectfully submitted,

BRETT A. SHUMATE
Assistant Attorney General

ELIZABETH J. SHAPIRO
Deputy Director

/s/ Pierce J. Anon
PIERCE J. ANON
(N.Y. Bar No. 6184303)
Trial Attorney
U.S. Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, NW
Washington, D.C. 20005
Phone: (202) 305-7573
pierce.anon@usdoj.gov

Attorneys for Defendants