

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 20-1580 (RCL)
)	
JOHN R. BOLTON)	
)	
Defendant,)	
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PLAINTIFF’S CONSENT MOTION FOR AN ENLARGEMENT OF TIME

Plaintiff, the United States of America, respectfully requests that the Court enlarge the commencement of the current discovery deadlines in this matter by 30 days, to March 3, 2021. *See* ECF No. 60. Plaintiff has conferred with Defendant on the substance of this motion pursuant to Local Civil Rule 7(m), and Defendant consents to the relief sought.

As grounds for the relief requested, Plaintiff states as follows:

1. This matter arises from a dispute between the parties over Defendant’s compliance with contracts he signed regarding the protection of classified information obtained during his service as the Assistant to the President for National Security Affairs.
2. On January 14, 2021, the Court granted, in part, Defendant’s Civil Rule 56(d) motion, and entered an order setting a schedule for phased discovery of Plaintiff in support of Defendant’s “unclean hands” defense. The Court ordered that, by February 1, 2021, both parties shall make Rule 26(a)(1) initial disclosures to each other and Defendant shall provide a phased discovery plan to Plaintiff. ECF No. 60, at 2.
3. On January 20, 2021, new leadership assumed responsibility for this litigation. To afford these officials sufficient time to become familiar with the issues in this case, the

United States requests an enlargement of the commencement of the discovery deadlines currently indicated in the Court's discovery schedule by 30 days, to March 3, 2021.

Accordingly, Plaintiff respectfully requests that the Court grant its consent motion for an enlargement of the commencement of the current discovery deadlines. A proposed order is attached.

Dated: January 28, 2021

Respectfully submitted,

BRIAN M. BOYNTON
Acting Assistant Attorney General

MICHAEL R. SHERWIN
Acting United States Attorney

ALEXANDER K. HAAS
Director, Federal Programs Branch

/s/ Joshua E. Gardner
JOSHUA E. GARDNER
Special Counsel
Federal Programs Branch

/s/ Brian P. Hudak
Brian P. Hudak
Assistant United States Attorney
555 Fourth Street N.W.
Washington, D.C. 20530
(202) 252-2549

Michael Gerardi
Trial Attorney
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street NW, Room 11514
Washington, D.C. 20005
Tel: (202) 616-0680
E-mail: michael.j.gerardi@usdoj.gov

Counsel for Plaintiff

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[PROPOSED] ORDER

UPON CONSIDERATION of Plaintiff’s Consent Motion for an Enlargement of Time, it is hereby

ORDERED that Plaintiff’s motion is GRANTED; and it is further

ORDERED that the parties shall have through and including March 3, 2021, to make initial fact disclosures and that Defendant shall provide a phased discovery plan to Plaintiff on or before March 3, 2021.

SO ORDERED.

Dated: _____, 2021

ROYCE C. LAMBERTH
United States District Judge