

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

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**GEORGE A. SHORT,** )  
) )  
**Plaintiff** )  
) )  
**v.** )  
) )  
**MICHAEL CHERTOFF, SECRETARY** )  
**UNITED STATES DEPARTMENT OF** )  
**HOMELAND SECURITY,** )  
) )  
**Defendant** )  
) )  


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**Civil Action No. 05-01034 (RMU)**

**MOTION FOR EXTENSION OF TIME**

The defendant respectfully requests an extension of time of 14 days in which to file its dispositive motion in this matter. Dispositive motions are currently scheduled to be filed by September 10, 2007.

Agency Counsel in this matter has been engaged in a move from Washington, D.C. to Connecticut and has been and continues to be unavailable to assist the undersigned in the preparation of defendant's motion for summary judgment, specifically in coordinating contacts for affidavits and other information needed to complete the motion. No decision has been made as to whether another agency counsel will be assigned to the matter, but a support person in the agency has been assigned to assist undersigned counsel in finding the appropriate individuals so that counsel can obtain the needed information from them. This support person also has been able to obtain some of the additional information needed by counsel.

The defendant needs the requested additional time to obtain the information and affidavits

required to complete its motion. This is the second motion for an extension of time to file its dispositive motion filed by defendant. Defendant has e-mailed plaintiff's counsel and left a telephone message in an attempt to consult concerning this motion, but has not yet received a response. However, plaintiff did not consent to defendant's first motion for an extension of time, which was made following the extension of the discovery cut-off date in this matter. A proposed order is attached with this motion.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
JEFFREY A. TAYLOR, D.C. Bar #498610  
United States Attorney

\_\_\_\_\_/s/\_\_\_\_\_  
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\_\_\_\_\_/s/\_\_\_\_\_  
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