

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

FELIX J. ESQUIBEL,)	
)	
)	
Plaintiff,)	
)	Civil Action No. 06-1485 (PLF)
V.)	
)	ECF
MARIA CINO,)	
Secretary, Dept. of Transportation)	
)	
Defendant.)	

CONSENT MOTION
FOR AN EXTENSION OF TIME TO CONDUCT DISCOVERY

Defendant, by and through her undersigned attorneys, hereby respectfully requests an enlargement of time, to and including December 18, 2007, to complete discovery in this matter. Discovery is now set to conclude on November 29, 2007. Plaintiff, through counsel, consents to the filing of this motion.

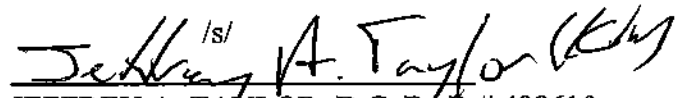
According to the Court's Order dated August 30, 2007, discovery will close on November 29, 2007. However, this additional time is being requested in order to allow both parties to complete the depositions necessary to be taken in this case. Two defense witnesses have already been deposed, but it is anticipated that there will be additional testimony taken. Defendant anticipates deposing the plaintiff and the plaintiff has indicated that he wishes to depose other witnesses. Written discovery has been completed.

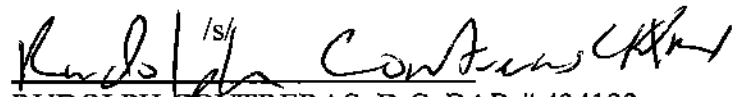
In addition, defense counsel has had other litigation responsibilities in the interim including the following: Motion to Dismiss in Winston v. Samper, Civ. Act No. 07-1411(RWR);

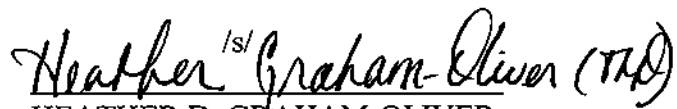
Motion for Summary Judgment in Daniels v. Bruce James, Civ. act. No. 05-2455 (GK);
Appellate brief in Kaufman v. Gonzales, District of Columbia, Circuit Court Case No. 06-5259;
preparing witnesses and defending depositions in Esquibel v. Cino, Civ. Act. No. 06-1485 (PLF);
preparing for mediation in both Legnini v. USA, Civ. Act. No. 06-0012 (RJL) and Hawkins v. Gonzales, Civ. Act. No. 07-0010 (CKK); and answering to discovery responsibilities in Anderson v. Spellings, Civ. Act. No. 06-1565 (CMC). As a result, a little more time is necessary for the parties to complete discovery.

Accordingly, defendant respectfully requests that it be allowed up to and including December 18, 2007, to complete discovery in this matter. No other dates will be effected by this extension.

Respectfully submitted,


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