

U.S. Department of Justice Civil Division Federal Programs Branch 20 Massachusetts Ave, N.W. Washington, DC 20530

February 17, 2017

VIA ECF

The Honorable Ronnie Abrams United States District Court Southern District of New York 40 Foley Square, Room 2203 New York, NY 10007

Re: Citizens for Responsibility and Ethics in Washington v. Donald J. Trump,

Civil Action No. 1:17-cv-00458-RA

Dear Judge Abrams:

On January 23, 2017, this Court issued an order directing the parties to advise the Court of any contemplated motions and propose a briefing schedule. The Defendant's answer or other response to the Complaint is currently due on April 4, 2017. The parties have conferred and hereby propose the following schedule that would extend the answer date:

Defendant's Response to the Complaint, including any Dispositive Motion will be due on April 21, 2017

Plaintiff's Response to any Dispositive Motion would be due on June 2, 2017

Defendant's Reply would be due on June 30, 2017.

Because the Defendant expects that his dispositive motion, if any, will raise only legal issues pursuant to Federal Rule of Civil Procedure 12(b), the parties have agreed to postpone discussing any discovery schedule in this action until the dispositive motion is adjudicated.

Respectfully submitted

Norman L. Eisen Noah Bookbinder

CREW

455 Massachusetts Avenue, N.W.

Washington, D.C. 20001

Deepak Gupta Gupta Wessler 1735 20th Street, NW Washington, D.C. 20009

/s/ Joseph M. Sellers

Joseph M. Sellers Cohen Milstein Sellers & Toll, PLLC 1100 New York Avenue, N.W.

Washington, D.C. 20005

Counsel for the Plaintiff

CHAD A. READLER

Acting Assistant Attorney General

Civil Division

JENNIFER D. RICKETTS

Branch Director, Federal Programs Branch

ANTHONY J. COPPOLINO

Deputy Director

<u>/s/ Jean Lin</u>

JEAN LIN

JAMES R. POWERS

U.S. Department of Justice

Civil Division,

Federal Programs Branch

20 Massachusetts Ave., NW

Washington, DC 20530

Counsel for the Defendant