



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

April 19, 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, et al. v. Trump*,
Civil Action No. 1:17-cv-00458-RA

Dear Judge Abrams:

On February 17, 2017, this Court adopted the parties' proposed briefing schedule for the Defendant's anticipated dispositive motion. Under that schedule, the Defendant's dispositive motion would be due on April 21, 2017. On April 18, 2017, the Complaint was substantially amended to add two new plaintiffs as well as a claim under the Presidential Compensation Clause of the Constitution, U.S. Const. art. II, cl. 7, among many other new allegations. Under Federal Rule of Civil Procedure 15(a)(3), the Defendant's deadline for responding to the Amended Complaint is May 2, 2017. The parties believe that due to the substantial amendment and the significance of the issues, a longer briefing schedule is warranted. Accordingly, the parties respectfully propose the following schedule:

Defendant's Dispositive Motion will be due on June 2, 2017

Plaintiffs' Response to any Dispositive Motion will be due on July 14, 2017

Defendant's Reply will be due on August 11, 2017

Respectfully submitted

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