



Joseph M. Sellers
(202) 408-4604
jsellers@cohenmilstein.com

June 30, 2017

By ECF Filing

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

Re: *Citizens for Responsibility and Ethics in Washington, et al. v. Trump*,
Civil Action No. 1:17-cv-00458-RA

Dear Judge Abrams:

The parties hereby respectfully request that this Court modify the remaining briefing schedule and enlarge the page limits for the two remaining briefs related to the Defendant's Motion to Dismiss.

On May 11, 2017, following Plaintiffs' filing of the Second Amended Complaint, the Court adopted the parties' proposed schedule for briefing related to Defendant's anticipated dispositive motion. In light of the number of issues that this matter presents and the fact that the case raises two novel constitutional claims, Defendant filed a consent motion for an expansion of the page limit governing his opening brief due on June 9, 2017, which the Court approved on May 31, 2017.

For much of the same reasons, the Plaintiffs request a comparable expansion of the page limit for their responsive brief to 60 pages and Defendant requests an expansion of the page limit for his reply brief to 30 pages. Moreover, the parties now jointly request an expansion of the remainder of the schedule governing briefing of Defendant's dispositive motion. Lead counsel for Defendant also has a previously-scheduled three-week vacation in August and multiple deadlines for dispositive motions in other matters in September. Therefore, the parties respectfully propose the following modifications to the rules governing the balance of the briefing of the pending dispositive motion:

Plaintiffs' Response to Motion to Dismiss may be up to and including 60 pages in length. It will be due on August 11, 2017.

Defendant's Reply may be up to 30 pages in length and will be due on October 6, 2017.

We thank you for your consideration of this request.

COHENMILSTEIN

June 30, 2017

Page 2

Respectfully submitted:

Norman L. Eisen
Noah Bookbinder
CREW
455 Massachusetts Avenue, N.W.
Washington, D.C. 20009

Deepak Gupta
Gupta Wessler
1900 L Street, N.W.
Washington, D.C. 20036

/s/ Joseph M. Sellers

Joseph M. Sellers
Cohen Milstein Sellers & Toll PLLC
1100 New York Ave., N.W.
Suite 500
Washington, D.C. 20005

Counsel for Plaintiffs

Chad A. Readler
Acting Assistant Attorney General
Civil Division

Jennifer D. Ricketts
Branch Director, Federal Programs Branch

Anthony J. Coppolino
Deputy Director

/s/ Jean Lin

Jean Lin
James R. Powers
U.S. Department of Justice
Civil Division,
Federal Programs Branch
20 Massachusetts Ave., N.W.
Washington, D.C. 20530

Counsel for the Defendant