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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION**

KELSEY CASCADIA ROSE JULIANA, et al.,
Plaintiffs,

Case No. 6:15-cv-01517-TC

v.

UNITED STATES OF AMERICA, et al.,
Federal Defendants.

**FEDERAL DEFENDANTS'
CONSENT MOTION TO
ENLARGE TIME TO
REPLY**

CONSENT MOTION TO ENLARGE TIME TO REPLY

Federal Defendants respectfully move the Court to enlarge their time to file a reply in support of their Motion to Dismiss (ECF No. 27). Under Fed. R. Civ. P. 6(b)(1), the Court may extend the time for filing the reply for good cause. The grounds for this motion are as follows:

1. Pursuant to the Court's order (ECF No. 36) granting the Plaintiffs' Consent Motion to Enlarge Time to Respond (ECF No. 35), Federal Defendants' Reply in Support of their Motion to Dismiss is presently due by February 3, 2016.

2. Plaintiffs' response in opposition to Federal Defendants' Motion to Dismiss is substantial, and includes a 45-page memorandum in support, as well as numerous supporting declarations and exhibits. *See* ECF Nos. 41, 43-47.
3. Plaintiffs named 22 individual and agency defendants in this case. Representatives for each defendant will need to review Federal Defendants' reply in support of the Motion to Dismiss and provide necessary feedback.
4. Due to a recent snow-storm, federal offices in Washington, DC closed at noon last Friday (January 22) and did not reopen until today (January 27) after a three-hour delay in the morning. This closure has delayed the preparation of the reply.
5. Undersigned counsel approached Plaintiffs and Intervenor-Defendants today regarding an extension of time to file a reply.
6. Plaintiffs and Intervenor-Defendants have consented to permit Federal Defendants to file the reply in support of the Motion to Dismiss by February 10, 2016.
7. Granting this motion will serve the public interest by ensuring that counsel for Federal Defendants has sufficient time to provide a well-researched, well-drafted, and well-edited reply brief, with necessary feedback from representatives of the individual and agency defendants. On the other hand, denying the motion would cause undue prejudice and harm to Federal Defendants' positions because their counsel would not have adequate time to complete the research and drafting process, submit the reply for review by representatives of the individual and agency defendants, and incorporate feedback before filing the reply.

Accordingly, Federal Defendants respectfully request an enlargement of one week to file a reply in support of the Motion to Dismiss, so that it is due by February 10, 2016.

Dated: January 27, 2016

Respectfully submitted,
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s/ Sean C. Duffy
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Certificate of Service

I hereby certify that on January 27, 2016, I filed the foregoing with the Clerk of Court via the CM/ECF system, which will provide service to all attorneys of record.

s/ Sean C. Duffy
Sean C. Duffy

Attorney for Federal Defendants