

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JULIO SUAREZ,	:	Case No. 1:14cv968
	:	
Plaintiff	:	
	:	
v.	:	Hon. William W. Caldwell
	:	
ERIC H. HOLDER, JR.,	:	
Attorney General of the United	:	
States; and B. TODD JONES,	:	
Director of the Bureau of	:	
Alcohol, Tobacco, Firearms and	:	
Explosives,	:	
	:	
Defendants.	:	Electronically Filed

**DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO FILE  
COMBINED CLOSING MERITS BRIEF AND FOR EXTENSION OF TIME**

Defendants hereby request the Court to permit them to file a combined reply brief in support of their motion to dismiss or for summary judgment, and response to Plaintiff's cross-motion for summary judgment. Additionally, pursuant to Fed. R. Civ. P. 6(b), Defendants respectfully request that the Court extend the time for filing this combined brief until Monday, December 29, 2014. Defendants state the following in support thereof:

1. Defendants' reply brief in support of their motion to dismiss or for summary judgment is due December 1, 2014.
2. Defendants' response to Plaintiff's cross-motion for summary judgment is due December 8, 2014.

3. In lieu of filing two separate briefs, Defendants plan to file a single combined brief.

4. Additionally, due to the press of business and other litigation, Defendants respectfully request that the Court enlarge the time for Defendants to file such a combined brief until Monday, December 29, 2014.

5. Counsel for Plaintiff has informed Defendants' counsel that Plaintiff does not oppose the relief sought in this motion.

WHEREFORE, Defendants request that their unopposed motion for leave to file a combined reply brief in support of their motion to dismiss or for summary judgment, and response to Plaintiff's cross-motion for summary judgment; and for an extension of time be granted. A proposed order is attached hereto in accordance with the Court's Local Rules.

Of Counsel

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Respectfully submitted,

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*Attorneys for Defendants*

Date: November 24, 2014

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JULIO SUAREZ,	:	Case No. 1:14cv968
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Plaintiff	:	
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v.	:	Hon. William W. Caldwell
	:	
ERIC H. HOLDER, JR.,	:	
Attorney General of the United	:	
States; and B. TODD JONES,	:	
Director of the Bureau of	:	
Alcohol, Tobacco, Firearms and	:	
Explosives,	:	
	:	
Defendants.	:	Electronically Filed

**CERTIFICATE OF SERVICE BY MAIL**

The undersigned hereby certifies that he is an employee of the Civil Division of the U.S. Department of Justice and is a person of such age and discretion as to be competent to serve papers.

That on November 24, 2014, he served copies of the attached

**UNOPPOSED MOTION FOR LEAVE TO FILE COMBINED CLOSING  
MERITS BRIEF AND FOR EXTENSION OF TIME**

via the Court's electronic case filing system to the electronic mail addresses stated below:

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/s/ Daniel Riess  
Daniel Riess