

**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
EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b), Defendants respectfully request that the Court enlarge the time for Defendants to respond to Plaintiff's complaint until Monday, October 20, 2014. Defendants state the following in support thereof:

1. Defendants' response to Plaintiff's complaint is presently due September 30, 2014.
2. Counsel for Defendants has recently been assigned to this case, and will be out of the office from September 17 through September 29, 2014.
3. Due to counsel's absence, and the press of business and other litigation, in order to appropriately respond to Plaintiff's complaint, Defendants respectfully request an enlargement of time until October 20, 2014.

4. Counsel for Plaintiffs has informed Defendants' counsel that Plaintiffs do not oppose the relief sought in this motion.

WHEREFORE, Defendants request that their unopposed motion for an enlargement of time be granted. A proposed order is attached hereto in accordance with the Court's Local Rules.

Of Counsel

PETER SMITH
United States Attorney

Respectfully submitted,

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Attorneys for Defendants

Date: September 12, 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
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ERIC H. HOLDER, JR.,	:	
Attorney General of the United	:	
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Director of the Bureau of	:	
Alcohol, Tobacco, Firearms and	:	
Explosives,	:	
	:	
Defendants.	:	Electronically Filed

CERTIFICATE OF SERVICE BY MAIL

The undersigned hereby certifies that she 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 September 12, 2014, she served copies of the attached

**UNOPPOSED MOTION FOR EXTENSION OF
TIME TO RESPOND TO COMPLAINT**

by placing said copies in postpaid envelopes addressed to the persons hereinafter named, at the places and addresses stated below, which are the last known addresses, and by depositing said envelopes and contents in the United States Mail at Washington, D.C.

Addressees:

Alan Gura
Gura & Possessky, PLLC
105 Oronoco Street, Suite 305

Alexandria, Virginia 22314

Douglas Gould (PA Bar No. 78357)
Law Offices of Douglas T. Gould, P.C.
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/s/ Debra Herbert
Debra Herbert
Administrative Assistant