

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

_____)	
UNITED STATES OF AMERICA,)	
)	
v.)	Case No. 1:12-cr-0003
)	
KIM DOTCOM, <i>et al.</i> ,)	
)	
Defendants.)	
)	
_____)	

CONSENT MOTION FOR EXTENSION OF TIME

Kyle Goodwin, by and through his undersigned attorneys, hereby moves the Court to extend the deadline for the filing of his reply brief in support of his Motion to Unseal by seven days, to November 19, 2012. In support of the motion Mr. Goodwin declares as follows:

1. On October 22, 2012, Mr. Goodwin filed a Motion to Unseal documents related to search warrants in this case. On November 5, 2012, the United States filed its opposition to that motion, concurrently filing *ex parte* and under seal its statement of reasons as to why certain portions of the sealed materials should remain unsealed. The United States also filed *ex parte* and under seal proposed redacted versions of the sealed material.

2. On November 8, 2012, the Court ordered certain redacted materials unsealed.

3. Because those unsealed materials are relevant to Mr. Goodwin's reply in support of his Motion to Unseal, he hereby moves for an additional seven days to submit his reply in support of his Motion.

4. Counsel for Mr. Goodwin contacted counsel for the government regarding this motion, and opposing counsel consents to the extension of the deadline. A proposed order is attached to this motion.

Dated: November 9, 2012

Respectfully submitted,

/s/ John S. Davis

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