

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

RANDY SQUIRES, *et al.*,

Plaintiffs,

v.

ROBERT ATCHESON, *et al.*,

Defendants.

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: C. A. No.1:05cv1120 (JR)
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**SECOND CONSENT MOTION OF DEFENDANT DISTRICT OF COLUMBIA TO
EXTEND THE TIME FOR DEFENDANTS TO FILE OPPOSITIONS TO
PLAINTIFF’S MOTION FOR RECONSIDERATION AND MOTION FOR LEAVE TO
AMEND THE COMPLAINT**

Defendant District of Columbia, by and through counsel, hereby moves this Court pursuant to Fed. R. Civ. Pro. 6 (b) and LCvR 7 (m) to extend the time, up to and including Friday May 26, 2006, by which the defendants to file their opposition to plaintiff’s motion for reconsideration and plaintiff’s motion to amend the complaint. In support of this consent motion the defendant states the following:

1. This is an employment discrimination case brought against the District of Columbia and Lieutenant Robert Atcheson of the Metropolitan Police Department.
2. On April 1, 2006, this Court entered an order dismissing plaintiff’s claims brought pursuant to 42 U.S.C. § 1981.
3. On April 20, 2006, plaintiff filed a motion asking this court to reconsider the order of April 1, 2006.

4. On May 12, 2006, this Court granted the defendant's consent motion to extend the time to file an opposition to plaintiff's motion until May 19, 2006.
5. On May 1, 2006, plaintiff filed a motion for leave to amend the complaint and oppositions were due on May 18, 2006.
6. The District's failure to file its oppositions to these motion was inadvertent and the result of excusable neglect given the heavy caseload of undersigned counsel.
7. On May 19, 2006, counsel for plaintiff again gave his consent to this motion and agreed to give the defendants up to and including Friday May 26, 2006 to file an opposition to plaintiff's motions.
8. Plaintiff will not be prejudiced if this motion is granted.

Respectfully submitted,

ROBERT J. SPAGNOLETTI
Attorney General

GEORGE VALENTINE
Deputy Attorney General
Civil Litigation Division

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/s/David A. Jackson/s/
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MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF SECOND
CONSENT MOTION OF DEFENDANT DISTRICT OF COLUMBIA TO EXTEND
THE TIME FOR DEFENDANTS TO FILE OPPOSITION TO PLAINTIFF’S MOTION
FOR RECONSIDERATION AND PLAINTIFF’S MOTION FOR LEAVE TO AMEND
THE COMPLAINT

1. Fed. R. Civ. Pro. 6 (b).
2. LCvR 7 (m).
3. The inherent powers of the Court.
4. The consent of the parties.
5. Entire record herein.

WHEREFORE, defendant respectfully moves this Court to grant the instant
Motion.

Respectfully submitted,

ROBERT J. SPAGNOLETTI
Attorney General

GEORGE VALENTINE
Deputy Attorney General
Civil Litigation Division

NICOLE L. LYNCH [471953]
Assistant Attorney General
Civ. Lit. Div., Chief Section II

/s/David A. Jackson/s/
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