

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

RANDY SQUIRES, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	C. A. No.1:05cv1120 (JR)(DAR)
	:	
ROBERT ATCHESON, <i>et al.</i> ,	:	
	:	
Defendants.	:	

CONSENT MOTION OF DEFENDANT DISTRICT OF COLUMBIA
TO CONTINUE THE MAY 1, 2007 MEDIATION

Defendant District of Columbia, by and through counsel, hereby moves this Court pursuant to Fed. R. Civ. Pro. 6 (b) (1) and LCvR 7 (m) to continue and reschedule the mediation scheduled for May 1, 2007 until June 11, 2007. In support of this motion of this consent motion the District states the following:

1. This is an employment discrimination case brought against the District of Columbia by sworn members of the Metropolitan Police Department.
2. This matter was referred to this Court on or about March 27, 2007 for mediation, which was to be completed within 60 days.
3. This Court scheduled mediation for May 1, 2007 at 2:00 PM.
4. Undersigned counsel is scheduled to begin a trial, *Settles, et al v. District of Columbia*, 04-288 (JR) at 9:30 AM on May 1, 2007. Additionally, undersigned counsel has a second trial, *Bowie v. Gonzalez, et al.*, 03-948 (RCL) scheduled to begin on May 14, 2007. Lastly, counsel for Plaintiff has a trial scheduled to begin on May 28, 2007.

5. During the pretrial conference on the *Settles* matter, undersigned counsel brought to Judge Robertson's attention that mediation in this case (*Squires*) was scheduled for the May 1, 2007 and that the parties would be seeking a 30 day extension to complete the *Squires* mediation. Judge Robertson granted the additional thirty (30) and told undersigned counsel that a formal motion to continue did not have to be filed with him.

6. Counsel for both parties has conferred with this Court's law clerk regarding alternative mediations dates and June 11, 2007 was a date open for both counsels and on this Court's calendar.

7. The District hereby requests that the mediation scheduled for May 1, 2007 be rescheduled for June 11, 2007. 's failure to file its opposition and failure to file this motion on May 5, 2006 was inadvertent and the result of excusable neglect.

Respectfully submitted,

LINDA SINGER
Attorney General

GEORGE VALENTINE
Deputy Attorney General
Civil Litigation Division

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MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF CONSENT
MOTION OF DEFENDANT DISTRICT OF COLUMBIA TO CONTINUE
THE MAY 1, 2007 MEDIATION

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

WHEREFORE, the District respectfully moves this Court to grant the instant motion.

Respectfully submitted,

LINDA SINGER
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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