

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

DAVID C. RODEARMEL,)	
)	
Plaintiff,)	
)	No. 1:09-cv-00171-RBW-JR
v.)	
)	Honorable Karen LeCraft Henderson
HILLARY RODHAM CLINTON, <i>et al.</i>)	Honorable James Robertson
)	Honorable Reggie B. Walton
Defendants.)	
_____)	

**DEFENDANTS’ MOTION FOR AN EXTENSION
OF TIME TO RESPOND TO COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b), Defendants Secretary of State Hillary Rodham Clinton and the Department of State hereby request an extension of time of 30 days to answer or otherwise to respond to Plaintiff’s Complaint. Due to the extraordinary relief sought in Plaintiff’s Complaint – including an Order “enjoining Defendant Clinton from continuing to serve as U.S. Secretary of State” – Defendants’ response will require wide internal Executive Branch review prior to filing. Undersigned counsel has been informed that this review cannot practically be completed prior to the current due date of April 20, 2009. No previous extensions have been requested, and the granting of the relief sought here would not result in the delay of any scheduled hearings.

Pursuant to Local Rule 7(m), on April 15, 2009, undersigned counsel attempted to confer with Plaintiff’s counsel regarding this motion by both telephone and electronic mail. Efforts to reach counsel have been unsuccessful.

April 16, 2009

Respectfully submitted,

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_____)	

[proposed] ORDER

Upon consideration of the Defendants' Motion for Extension of Time to Respond to Complaint, it is hereby ORDERED that the Defendants' is GRANTED. Defendants shall have until May 20, 2009 to respond to the First Amended Complaint. IT IS SO ORDERED.

Dated: _____