

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

**BRET D. LANDRITH,** )  
**SAMUEL K. LIPARI,** )  
 )  
 **Plaintiffs, *pro se*,** )  
 )  
 **v.** )  
 )  
**HON. JOHN G. ROBERTS, JR.,** )  
**Chief Justice of the United States,** )  
 )  
 **Defendant.** )  
\_\_\_\_\_ )

**Civil Action No. 1:12-cv-01916 (ABJ)**

**DEFENDANT’S MOTION FOR A ONE BUSINESS DAY EXTENSION OF TIME TO  
FILE AN ANSWER OR OTHER RESPONSE TO PLAINTIFFS’ COMPLAINT**

Defendant Hon. John G. Roberts, Jr., Chief Justice of the United States, through undersigned counsel, moves this Court for an extension of time of one business day to respond to Plaintiffs’ complaint, to and including Monday, March 11, 2013. The answer is presently due on Friday, March 8, 2013. Undersigned counsel primarily assigned to this case has consulted with Plaintiff Lipari who indicates that Plaintiffs oppose this motion. In this connection, Mr. Lipari indicates that Plaintiffs have transmitted to the Court a written memorandum in opposition to Defendant’s first motion to extend, with attachments.

Grounds for this motion to extend are as follows: On March 6, 2013, the federal government was closed due to inclement weather conditions associated with a winter snowstorm. Because of the closure, undersigned counsel primarily assigned to this case was unable to complete research for a final draft of Defendant’s motion to dismiss. Additionally, on her way home the night before the closure, undersigned counsel experienced car problems, was towed to a repair shop, and had no transportation to her office until mid morning on March 7, 2013. Accordingly, undersigned counsel was unable to complete the research for a final draft of a

motion to dismiss and obtain agency and supervisory review to meet the present due date of March 8, 2013.

WHEREFORE, an extension of time, to and including March 11, 2013, is respectfully requested. As noted, Plaintiffs oppose this motion. A proposed order is attached.

Respectfully submitted,

RONALD C. MACHEN JR., Bar # 447889  
United States Attorney  
for the District of Columbia

DANIEL F. VAN HORN, D.C. Bar # 924092  
Chief, Civil Division

By: \_\_\_\_\_/s/\_\_\_\_\_  
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing motion to extend time and proposed order was transmitted to Plaintiffs by first class mail, postage pre-paid, this 7<sup>th</sup> day of March, 2013, to:

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5308 SW 10<sup>th</sup> Street  
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Topeka, KS 66604

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As a courtesy, counsel had provided these documents to them by email.

\_\_\_\_\_/s/\_\_\_\_\_  
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