

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

_____		)	
STEPHEN L. BRAGA,		)	
		)	
	Plaintiff,	)	
		)	
	v.	)	Civil Action No. 12-0139 (JEB)
		)	
FEDERAL BUREAU OF INVESTIGATION,		)	
		)	
	Defendant.	)	
_____		)	

**PLAINTIFF’S CONSENT MOTION FOR EXTENSION OF TIME  
TO RESPOND TO DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

Plaintiff Stephen L. Braga hereby moves the Court for an extension of sixty-days on the due date for his opposition to the defendant’s recently-filed motion for summary judgment. Government counsel, AUSA Alan Burch, has graciously consented to the granting of this motion. As grounds for this motion, plaintiff states the following:

1. The FOIA Complaint in this case was filed on January 27, 2012.
2. The defendant has previously been granted a number of extensions of time to respond to the Complaint, some consented to by the plaintiff and others unopposed.
3. On July 19, 2012, defendant finally filed its motion for summary judgment, with a substantial volume of supporting materials.
4. Given plaintiff’s schedule, he requires additional time to prepare his response to defendant’s lengthy filing.
5. No prejudice will result from allowing plaintiff to have an additional sixty-days time to file that responsive pleading.

WHEREFORE, it is in the interests of justice that the instant consented-to motion for an extension of time be granted.

Respectfully submitted,

/s/ Stephen L. Braga  
STEPHEN L. BRAGA  
(D.C. Bar No. 366727)  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Plaintiff's Consent Motion For Extension Of Time To Respond To Defendant's Motion For Summary Judgment was served on all counsel of record through the Court's ECF filing system this 24<sup>th</sup> day of July, 2012.

/s/ Stephen L. Braga  
STEPHEN L. BRAGA