

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

WALLACE G. DICKSON, on behalf of
himself and all others similarly situated,
Plaintiff,

v.

UNITED STATES OF AMERICA,
Defendant.

Case No. 14-cv-02221-RCL

ADAM STEELE, BRITTANY
MONTROIS, and a Class of More
than 700,000 Similarly Situated
Individuals and Businesses,
Plaintiffs,

v.

UNITED STATES OF AMERICA,
Defendant.

Case No. 14-cv-1523-RCL

**PLAINTIFF’S CONSENT MOTION AND
MEMORANDUM FOR EXTENSION OF TIME**

Pursuant to Rules 6(b)(1) and 7(b) of the Federal Rules of Civil Procedure, Plaintiff Wallace G. Dickson (“Plaintiff Dickson”) respectfully moves the Court, through his undersigned counsel, for an extension of time to file responsive briefs (or a single consolidated brief) in the above-captioned cases.¹

On January 8, 2015, Plaintiff Dickson filed a Motion for Order Consolidating Related Cases and Appointment of Hausfeld LLP and Boies, Schiller & Flexner LLP as Interim Co-Lead Counsel for the Proposed Class (the “*Dickson Motion*”). *See* No. 14-cv-2221, ECF No. 7. On February 5, 2015, Plaintiff Steele filed a Motion for Consolidation of Related Action and

¹ The Plaintiffs in both cases have agreed to consolidation of these cases (*see* No. 14-cv-2221, ECF No. 7; No. 14-cv-1523, ECF No. 28).

Appointment of Motley Rice LLC as Interim Class Counsel for the Proposed Class (the “*Steele* Motion”), which is also an opposition to the *Dickson* Motion.² See No. 14-cv-1523, ECF No. 28. Plaintiff Dickson’s reply in support of the *Dickson* Motion is currently due on February 17, 2015 and opposition to the *Steele* Motion is currently due on February 23, 2015.

Plaintiff Dickson requests a ten-day extension to file a reply in support the *Dickson* Motion and a four-day extension to file an opposition to the *Steele* Motion. The respective extensions are short in duration and not sought for any improper purpose but instead to ensure the Court has before it all relevant information when considering the competing motions. Pursuant to Local Rule 7(m), Plaintiff Dickson has, through the undersigned counsel, requested and received the consent to this extension from the United States and counsel for the *Steele* Plaintiffs.

Plaintiff Dickson therefore respectively requests that the Court grant his motion for an extension of time up through February 27, 2015.

Dated: February 12, 2015

Respectfully submitted,

/s/ Hilary K. Scherrer

Hilary Scherrer (#481465)
James J. Pizzirusso (#477604)
HAUSFELD LLP
1700 K Street, NW Suite 650 Washington, DC
20006 (202) 540-7200

Scott E. Gant (#455392)
Michael S. Mitchell (#986708)
BOIES, SCHILLER & FLEXNER LLP
5301 Wisconsin Avenue, NW
Suite 800

² On January 23, 2015, the Court granted the *Steele* Plaintiffs’ Consent Motion, providing an additional 10 days for them to respond to the *Dickson* Motion. No. 14-cv-1523, ECF No. 24.

Washington, DC 20015
(202) 237-2727

Jeffrey D. Kaniel (#983578)
Andrew Silver (#1017462)
TYCKO & ZAVAREEI LLP
2000 L Street, NW
Suite 808
Washington, DC 20036
(202) 973-0900

*Attorneys for Plaintiff Wallace G. Dickson
and the Proposed Class*

CERTIFICATE OF SERVICE

I, Hilary K. Scherrer, declare that on Thursday, February 12, 2015, I caused to be filed the foregoing **PLAINTIFF'S CONSENT MOTION AND MEMORANDUM FOR EXTENSION OF TIME** with the Clerk of Court in *Dickson v. United States of America*, No. 14-cv-2221, using the Official Court Electronic Document Filing System, which served copies on all interested parties registered for electronic filing in that matter, and by e-mail:

William H. Narwold
MOTLEY RICE LLC
One Corporate Center
20 Church Street, 17th Floor
Hartford, CT 06103
bnarwold@motleyrice.com

Nathan D. Finch
Elizabeth Smith
MOTLEY RICE LLC
3333 K Street NW, Suite 450
Washington, DC 20007
nfinch@motleyrice.com
esmith@motleyrice.com

Deepak Gupta
Jonathan E. Taylor
GUPTA BECK PLLC
deepak@guptabeck.com
jon@guptabeck.com
1735 20th Street, NW
Washington, DC 20009

Christopher S. Rizek
CAPLIN & DRYSDALE, CHARTERED
One Thomas Circle, NW, Suite 1100
Washington, DC 20005
crizek@capdale.com

Allen Buckley
LAW OFFICE OF ALLEN BUCKLEY LLC
2802 Paces Ferry Road, Suite 100-C

Atlanta, GA 30339
ab@allenbuckleylaw.com

/s/ Hilary K. Scherrer
Hilary K. Scherrer