

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

ADAM STEELE, BRITTANY	)	
MONTROIS, and a Class of More	)	
than 700,000 Similarly Situated	)	
Individuals and Businesses,	)	
	)	Civil Action No.: 1:14-cv-01523-RCL

Plaintiffs,

v.

United States of America,

Defendant.

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Wallace G. Dickson, on behalf of	)	
himself and all other similarly	)	
situated,	)	

Plaintiff,

Civil Action No.: 1:14-cv-02221-RCL

v.

United States of America,

Defendant.

**PLANTIFFS’ CONSENT MOTION AND  
MEMORANDUM FOR EXTENSION OF TIME**

Pursuant to Fed. R. Civ. P. 6(b)(1) and 7(b), Plaintiffs Adam Steele and Brittany Montrois (“Plaintiffs”) respectfully move the Court, through their undersigned counsel, for an extension of time to respond to a motion filed in the above-captioned, related case, *Dickson v. United States of America*, No. 1:14-cv-02221-TSC (D.D.C), also before this Court. In that case, on January 8, 2015 – one week after filing his complaint – Plaintiff Dickson filed, on behalf of himself and a proposed class, 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. *See id.*, ECF No. 7. Although the Motion was captioned with both the *Steele* case and the *Dickson* case, it was not actually filed in the *Steele* case. Thus, the Motion is not technically pending in the *Steele* case. Nonetheless, the *Steele* Plaintiffs intend to respond to the Motion and file their own motion for appointment of interim class counsel. The deadline for responding to the *Dickson* motion is January 26, 2015. The *Steele* Plaintiffs seek an extension up to and including February 5, 2015 within which to file their own motion for appointment of interim class counsel and to respond to the one filed in *Dickson*.

The *Steele* Plaintiffs do anticipate joining in *Dickson*'s motion for consolidation under Rule 42(a) of the Federal Rules of Civil Procedure. Additional time, however, is necessary for them to respond to the motion in *Dickson* and to file their own motion to appoint interim class counsel pursuant to Rule 23(g) of the Federal Rules of Civil Procedure. The brief enlargement sought here is necessary to prepare an appropriate motion and response. *See Fed. R. Civ. P.* 6(b)(1)(A) (providing for extensions of time for "good cause").

Pursuant to LCvR 7(m), undersigned counsel has discussed this requested extension with counsel for both the United States and *Dickson*, who consent to the relief requested herein. This enlargement is not sought for any improper purpose but to complete an appropriate submission for consideration by this Court. No party will be prejudiced by the extension requested here and it will have no effect on any other deadlines. Indeed, the United States has not yet entered an appearance in the *Dickson* case.

WHEREFORE, Plaintiffs respectively request that the Court grant their motion and grant an extension of time up through February 5, 2015. A proposed Order providing for this extension is submitted with this motion.

Dated: January 21, 2015

Respectfully submitted,

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*Attorneys for Plaintiffs Adam Steele,  
Brittany Montrois, and the Proposed Class*

**CERTIFICATE OF SERVICE**

I, William H. Narwold, declare that I am over the age of eighteen (18) and not a party to the entitled action. I am a member of the law firm MOTLEY RICE LLC, and my office is located at 20 Church Street, 17th Floor, Hartford, CT 06103.

On January 21, 2015, I caused to be filed the following in the above-captioned case:

**PLAINTIFFS' CONSENT MOTION AND MEMORANDUM FOR EXTENSION OF TIME**

**[PROPOSED] ORDER GRANTING PLAINTIFFS' CONSENT MOTION FOR EXTENSION OF TIME**

with the Clerk of Court using the Official Court Electronic Document Filing System, which served copies on all interested parties registered for electronic filing, and by e-mail and U.S. mail upon:

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counsel for the plaintiff in *Dickson v. United States of America*, No. 1:14-cv-02221-RCL  
(D.D.C.).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 21, 2015

Respectfully submitted,

By: s/ William H. Narwold  
William H. Narwold  
MOTLEY RICE LLC