

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-80736-CIV-MARRA

JANE DOE #1 and JANE DOE #2,

Petitioners,

vs.

UNITED STATES OF AMERICA,

Respondent.

RESPONDENT'S MOTION FOR ENLARGEMENT OF TIME TO
FILE DECLARATION IN SUPPORT OF ASSERTION OF
DELIBERATIVE PROCESS PRIVILEGE

Respondent, by and through its undersigned counsel, files its Motion for Enlargement of Time to File Declaration in Support of Assertion of Deliberative Process Privilege, and states:

1. The government has asserted the deliberative process privilege on a number of documents listed in its privilege log. Petitioners have challenged the assertion of this particular privilege, as well as the others invoked by the government.

2. Respondent's counsel has been working with the Department of Justice's Office of the Deputy Attorney General for the last two weeks, in an effort to obtain the declaration of an appropriate DOJ official, formally invoking the deliberative process privilege. The Office of the Deputy Attorney General has advised that additional time is needed to review the invocation of the deliberative process privilege.

3. Respondent respectfully requests an enlargement of time of ten (10) days, up to and including September 13, 2013, to file a declaration supporting the invocation of the deliberative process privilege.

CERTIFICATE OF CONFERENCE

On September 3, 2013, the undersigned conferred with petitioners' counsel by e-mail regarding the instant motion. Petitioners do not oppose respondent's request. Respondent does not oppose petitioners obtaining additional time of ten (10) days, after receipt of the declaration, to file a reply.

DATED: September 3, 2013

Respectfully submitted,

WILFREDO A. FERRER
UNITED STATES ATTORNEY

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ATTORNEY FOR RESPONDENT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 3, 2013, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

s/ Dexter A. Lee
DEXTER A. LEE
Assistant U.S. Attorney

SERVICE LIST

Jane Does 1 and 2 v. United States,
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