

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 OF UNITED STATES ATTORNEY IN SUPPORT
OF DELIBERATIVE PROCESS PRIVILEGE

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

1. On September 4, 2013, this Court granted the government's motion for enlargement of time to file declaration in support of invocation of the deliberative process privilege. The Court granted the government until Friday, September 13, 2013, to file the declaration.
2. The government asserted the deliberative process privilege on two classes of documents, those generated by components of the Department of Justice, and those generated by the U.S. Attorney's Office, Southern District of Florida.
3. The United States Attorney, Southern District of Florida, is reviewing the documents for which the deliberative process privilege was asserted, to determine if he will formally invoke the privilege. His review will be complete by September 19, 2013, and the undersigned expects the U.S. Attorney's declaration will be filed on Friday, September 20, 2013.

4. The government respectfully requests an enlargement of time of seven days, up to and including September 20, 2013, to file the declaration of the United States Attorney, in support of the invocation of the deliberative process privilege.

CERTIFICATE OF CONFERENCE

On September 13, 2013, petitioners' counsel advised that they do not oppose this motion. At present, petitioners' reply in support of their renewed motion for an order directing the U.S. Attorney's Office not to withhold relevant evidence is due on September 23, 2013, ten days after the filing of the government's declaration. D.E. 234. In the event the Court grant's the government's motion, the government respectfully requests that petitioners' date for filing their reply be enlarged to September 30, 2013.

DATED: September 13, 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 13, 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

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