



U.S. Department of Justice

*United States Attorney
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January 17, 2020

FILED VIA ECF

Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Guan v. Wolf*, No. 19-CV-6570 (PKC)

Dear Judge Chen:

We represent the defendants in the above-referenced case, in which a number of journalist plaintiffs sue several federal agencies seeking a declaratory judgment that certain alleged interactions violated their rights under the First Amendment. This Office was served with the summons and complaint on November 25, 2019, which would make the Government's presumptive deadline to answer or move in response next Friday, January 24. The Government respectfully seeks a four week extension of this deadline, until February 21, 2020, to allow counsel sufficient time to gather the relevant facts and to consult with multiple client agencies about the response. This is the first request for an extension sought by the Government, and Plaintiffs, through their counsel, consent. We appreciate the Court's time and attention to this matter.

Respectfully submitted,

RICHARD P. DONOGHUE
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By: /s/ {FILED ELECTRONICALLY}
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