

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

RANDY SQUIRES, *et al.*,

Plaintiffs,

v.

ROBERT ATCHESON, *et al.*,

Defendants.

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: C. A. No.1:05cv1120 (JR)
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**CONSENT MOTION OF DEFENDANT DISTRICT OF COLUMBIA FOR ORDER
NUNC PRO TUNC TO EXTEND THE TIME FOR DEFENDANTS TO FILE THEIR
OPPOSITION TO PLAINTIFF’S MOTION FOR RECONSIDERATION**

Defendant District of- Columbia, by and through counsel, hereby move this Court pursuant to Fed. R. Civ. Pro. 6 (b) and LCvR 7 (m) to extend the time, up to and including Friday May 19, 2006, by which the defendants to file their opposition to plaintiff’s motion for reconsideration. In support of this consent motion the defendant states the following:

1. This is an employment discrimination case brought against the District of Columbia and Lieutenant Robert Atcheson of the Metropolitan Police Department.
2. On April 1, 2006, this Court entered an order dismissing plaintiff’s claims brought pursuant to 42 U.S.C. § 1981.
3. On April 20, 2006, plaintiff filed a motion asking this court to reconsider the order of April 1, 2006.
4. The defendants’ opposition was due on May 5, 2006 and on that day counsel for plaintiff gave his consent to this motion.

5. Undersigned counsel failed to file an opposition to plaintiff's motion because undersigned counsel was busy preparing for a three week trial which was to begin on May 2, 2006.

6. The District's failure to file its opposition and failure to file this motion on May 5, 2006 was inadvertent and the result of excusable neglect.

7. On May 11, 2006, counsel for plaintiff again gave his consent to this motion and agreed to give the defendants up to and including Friday May 19, 2006 to file their opposition to plaintiff's motion for reconsideration.

Respectfully submitted,

ROBERT J. SPAGNOLETTI
Attorney General

GEORGE VALENTINE
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	:	
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MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF CONSENT
MOTION OF DEFENDANT DISTRICT OF COLUMBIA TO ENTER AN ORDER
NUNC PRO TUNC TO EXTEND THE TIME FOR DEFENDANTS FILE THEIR
OPPOSTION TO PLAINTIFF’S MOTION FOR RECONSIDERATION

1. Fed. R. Civ. Pro. 6 (b).
2. LCvR 7 (m).
3. The inherent powers of the Court.
4. The consent of the parties.
5. Entire record herein.

WHEREFORE, defendant respectfully moves this Court to grant the instant Motion.

Respectfully submitted,

ROBERT J. SPAGNOLETTI
Attorney General

GEORGE VALENTINE
Deputy Attorney General
Civil Litigation Division

NICOLE L. LYNCH [471953]
Assistant Attorney General
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