

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

Randy Squires, et al.	)	
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
Robert Atcheson, et al.	)	Civil Action No.: 1:05-cv-01120 (JR)
	)	Judge James Robertson
Defendants.	)	
	)	
	)	
	)	

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**MEMORANDUM OF POINTS AND AUTHORITIES  
IN SUPPORT OF PLAINTIFFS' CONSENT MOTION FOR  
ENLARGEMENT OF TIME TO CONDUCT DISCOVERY**

Plaintiffs, by and through undersigned counsel, respectfully submits this Memorandum of Points and Authorities in Support of Plaintiffs' Consent Motion for Enlargement of Time to Conduct Discovery. This motion should be granted, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, for the reasons set forth herein.

1. Plaintiffs commenced this litigation on June 7, 2005.
2. Plaintiffs filed a First Amended Complaint on December 1, 2005.
3. Defendants Atcheson and District of Columbia filed their answers on December 15 and December 16, respectively.
4. This Court entered a scheduling order on February 16, 2005, stating that fact discovery must be completed by June 13, 2006.
5. On February 17 and March 27, 2006, Defendants Atcheson and District of Columbia, respectively, filed motions for judgment on the pleadings, effectively staying discovery until the Court's ruling on the motions.

6. On April 12, 2006, this Court granted Defendant Atcheson's motion, and granted in part and denied in part Defendant District of Columbia's motion. Thus, the Court's ruling dismissed all claims for all but two of the seven plaintiffs.

7. On April 20, 2006 Plaintiffs moved this Court to reconsider its order of dismissal.

8. This Court granted Plaintiffs' Motion for Reconsideration on May 31, 2006 with respect to Defendant District of Columbia, thereby reinstating the claims against the District for the five plaintiffs whose claims previously had been dismissed.

9. Now that the legal issues before the court have been framed, and the status of the litigants is more certain than previously was the case, Plaintiffs and Defendant District are prepared to commence with discovery.

10. For these reasons, Plaintiffs and Defendant District respectfully request a sixty-day extension of the time in which discovery may be taken. As such, the parties respectfully request an order stating that discovery shall be completed on or before August 13, 2006.

Dated this 13<sup>th</sup> day of June, 2006

/s/

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