

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

**KANWAR BIR SINGH, *et al*,**

**Plaintiffs,**

**VS.**

**Case No. 16-581-BAH**

**LIEUTENANT GENERAL JAMES C.**

**McCONVILLE, in his official capacity as Deputy Chief of Staff, G-1, U.S. Army, *et al.*,**

## Defendants.

**CONSENT MOTION FOR ENLARGEMENT OF TIME TO FILE RESPONSE TO  
PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

Pursuant to Federal Rules of Civil Procedure (“Rules”) 1 and 6(b)(1)(A), Defendants hereby respectfully file this motion for an extension of two (2) days in which to reply to Plaintiff’s Motion for a Preliminary Injunction, until and including April 13, 2016. Defendants and Plaintiffs have conferred, through counsel, and Plaintiffs consent to this request. Plaintiff’s Reply to Defendant’s Opposition would likewise be extended to April 18, 2016.

Plaintiff brings this action pursuant to Religious Freedom Restoration Act (42 U.S.C § 2000bb, *et seq.*), as well as the First and Fifth Amendments to the United States Constitution alleging that the Defendants are discriminating against Plaintiffs due to their religion.

Good cause exists for granting this motion. All Plaintiffs currently have outstanding requests for accommodation pending. It is the understanding of the undersigned counsel that the decision authority intends to make a determination regarding the accommodation requests on April 8, 2016. It is the Defendants' belief that the decision has the potential to impact the efficacy of a preliminary injunction. Defendants, therefore, request the additional time to assess

the impact of the decision on filings as well as any coordination that may be helpful with Plaintiffs, through counsel, regarding the necessity for further litigation.

The requested two days extension for filing their opposition to the preliminary injunction request will not prejudice the Plaintiffs. As pointed out in Plaintiffs' motion, the earliest date affected by the litigation is May 9, 2016. ECF No. 9 at 3. This date is still nearly a month away from the date requested by the Defendants.

WHEREFORE, Defendants respectfully request that the Court grant this motion and extend the deadline to file their Opposition to Plaintiffs' Motion for a Preliminary Injunction through and including **April 13, 2015**. A proposed order is attached.

Respectfully Submitted,

CHANNING D. PHILLIPS  
D.C. Bar #415793  
United States Attorney  
for the District of Columbia

DANIEL F. VAN HORN  
D.C. Bar #924092  
Chief, Civil Division

BY: \_\_\_\_\_/s/  
DERRICK W. GRACE  
Special Assistant U.S. Attorney  
555 Fourth Street, N.W.  
Washington, D.C. 20530  
(202) 252-2574  
derrick.grace@usdoj.gov

*Attorneys for Defendants*

