

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

GRANT F. SMITH,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 14-01611 (TSC)
)	
DEPARTMENT OF DEFENSE,)	
)	
Defendant.)	
)	

**MOTION FOR AN EXTENSION OF TIME
TO RESPOND TO PLAINTIFF’S COMPLAINT**

Defendant respectfully moves the Court for an extension of its deadline to respond to the Plaintiff’s Complaint (ECF No. 1), brought under the Freedom of Information Act (FOIA), 5 U.S.C. § 552. *See* Fed. R. Civ. P. 6(b)(1)(A). Defendant’s response is currently due October 30, 2014. Defendant seeks an extension of time, up to and including December 9, 2014, to respond to Plaintiff’s Complaint filed on September 23, 2014. Defendant attempted to contact Plaintiff, who is *pro se*, by telephone and e-mail to obtain his position on this motion but was unsuccessful. This is the first request by Defendant for an extension of the deadline to respond to the Complaint. As set forth below, there is good cause to grant this motion.

Plaintiff’s complaint names the Department of Defense (“DOD”) and concerns a FOIA request dated January 5, 2012. (ECF No. 1.) Plaintiff, an author and public researcher and founder of the Institute for Research: Middle Eastern Policy, filed the FOIA request seeking a copy of the 1987 DOD-chartered study conducted by the Institute for Defense Analysis titled “Current Technology Issues in Israel.” (*Id.*) Agency counsel requires additional time to fully

