

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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TRIPOLI ROCKETRY ASSOCIATION, INC.,))
and NATIONAL ASSOCIATION OF))
ROCKETRY,))
))
Plaintiffs,))
))
v.))
))
U.S. BUREAU OF ALCOHOL, TOBACCO,)	Civil Action No. 00-273 (RBW)
FIREARMS, AND EXPLOSIVES,))
))
Defendant.))
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**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE REPLY MEMORANDUM**

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure, Plaintiffs Tripoli Rocketry Association, Inc. and the National Association of Rocketry respectfully move this Court for an extension of time to file its reply to Defendant Bureau of Alcohol, Tobacco, Firearms and Explosives' Opposition to Plaintiffs' Petition for Attorneys' Fees and Costs Pursuant to the Equal Access to Justice Act. Plaintiffs' reply memorandum is presently due on August 4, 2009, pursuant to this Court's Order of July 10, 2009 granting Defendant's second Motion for Extension of Time to File its response memorandum. Plaintiffs now request an extension until August 10, 2009 to file their reply.

Pursuant to Local Rule 7(m), counsel for Plaintiffs has conferred with counsel for Defendant, and Defendant's counsel does not oppose the requested extension.

Defendant's memorandum presents several complex and unique arguments as to why the relief sought by Plaintiffs should be denied outright by this Court, or at least substantially

reduced. Responding to this memorandum will require time-intensive legal and factual research and analysis. The additional requested time to reply is thus necessary because the allotted time for Plaintiffs' reply coincides with previously scheduled vacations for Plaintiffs' counsel. Plaintiffs' counsel did not anticipate that these vacations would conflict with their responsibilities in this matter.

This motion is filed in good faith, and the relief sought in this motion will not unduly delay resolution of this matter. This case is otherwise concluded. Plaintiffs did not oppose either of Defendant's requests for extension of time to file their response. Allowing Plaintiffs a reasonable amount of additional time to reply is fair under all of the circumstances.

For all of these reasons, Plaintiffs respectfully request an extension of time to file its reply to Defendant's opposition memorandum from August 4, 2009 to August 10, 2009.

Respectfully submitted,

(signed electronically)

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COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Tripoli Rocketry Association's and National Association of Rocketry's Motion For Extension Of Time To File Reply Memorandum was served on the following attorneys of record by electronically filing the document on the CM-ECF document filing system for the United States District Court for the District of Columbia on this 28th day of July, 2009:

Jane Lyons, Esq.
Assistant United States Attorney
555 Fourth Street, N.W.
Washington, D.C. 20001

(signed electronically)
Martin G. Malsch