

UNITED STATES COURT OF CLAIMS

Joshua J. Angel, on behalf of himself and all others
similarly situated,

Plaintiff,

v.

UNITED STATES,

Defendant.

Case No.: 20-737C
(Chief Judge Sweeney)

UNOPPOSED MOTION FOR ENLARGMENT OF TIME

Pursuant to Rule 6.1(b) of the Rules of the United States Court of Federal Claims, Plaintiff respectfully requests that the Court grant this unopposed motion for enlargement of time to oppose Defendant's motion to dismiss.

On August 18, 2020, Defendant filed its motion to dismiss the complaint in this action. The current deadline for Plaintiff to oppose Defendant's motion to dismiss is September 15, 2020.

After meeting and conferring, the parties agreed that the deadline for Plaintiff to oppose Defendant's motion to dismiss should be extended until September 30, 2020 (a 15 day extension), to allow Plaintiff, who is appearing *pro se* in this action, more time to prepare his papers. The parties further agreed that the deadline for Defendant to submit its reply in further support of its motion to dismiss should be extended until November 30, 2020.

In addition to the fact that Plaintiff is acting *pro se* in this action, an enlargement of time is necessary because: (i) Plaintiff has limited resources; and (ii) upon review of Defendant's papers in support of its motion to dismiss, Plaintiff anticipates filing a motion to adjourn Defendant's motion to dismiss in order to permit discovery. The parties agreed that the above schedule and this unopposed motion shall not limit Plaintiff's right to file a motion seeking the adjournment of

Defendant's motion to dismiss in order to permit discovery, which would include a request to adjourn Defendant's motion to dismiss until after the Court has resolved any such motion by Plaintiff.

No previous requests have been filed seeking enlargement of time with respect to Defendant's motion to dismiss. Counsel for the United States has stated that the United States consents to the schedule set forth in this motion.

CONCLUSION

For the reasons set forth above, Plaintiff respectfully requests that the Court grant this unopposed motion for an enlargement of time.

Dated: New York, NY
September 9, 2020

Respectfully submitted,

/s Joshua J. Angel
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