

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**

FAIRHOLME FUNDS, INC., <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	No. 13-465C
v.	)	(Judge Sweeney)
	)	
THE UNITED STATES,	)	
	)	
Defendant.	)	

**PLAINTIFFS’ UNOPPOSED, TIME-SENSITIVE MOTION FOR AN ENLARGEMENT OF TIME TO FILE A RESPONSE TO THE GOVERNMENT’S SUPPLEMENTAL MOTION TO DISMISS**

Pursuant to RCFC 6.1(a), Plaintiffs respectfully move for an enlargement of time of 30 days to file a response to the Government’s supplemental motion to dismiss (Doc. 161). On June 17, Plaintiffs moved to stay briefing (Doc. 164) on the Government’s supplemental motion, to which the Government responded on July 6 (Doc. 182). Plaintiffs intend to timely file a reply in support of their stay motion soon.

Without an enlargement of time, Plaintiffs’ response would be due tomorrow, July 9. Good cause exists for an extension because this Court is currently considering Plaintiffs’ motion to stay briefing on the Government’s supplemental motion, and the stay motion would be rendered moot if Plaintiffs had to file a response to the Government’s supplemental motion tomorrow. In order to preserve the status quo and permit the Court time to consider Plaintiffs’ stay motion, Plaintiffs respectfully request that this Court enter an order enlarging the amount of time Plaintiffs have to file their response to the Government’s supplemental motion by 30 days, such that Plaintiffs’ response would be due on August 10, 2015.

In accordance with RCFC 6.1(b), Plaintiffs have consulted with opposing counsel, and the Government does not oppose this motion.

Date: July 8, 2015

Respectfully submitted,

*Of counsel:*

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing was served upon all counsel of record on this 8th day of July, 2015, via the Court's Electronic Case Filing system.

s/ Charles J. Cooper  
Charles J. Cooper