

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

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

**GRANT THORNTON LLP’S MOTION FOR AN ENLARGEMENT OF  
 TIME TO RESPOND TO PLAINTIFFS’ MOTION TO REMOVE  
 THE “PROTECTED INFORMATION” DESIGNATION  
FROM CERTAIN GRANT THORNTON DOCUMENTS**

Pursuant to Rules 6(b) and 6.1 of the Rules of the United States Court of Federal Claims, nonparty Grant Thornton LLP (“Grant Thornton”) respectfully requests an enlargement of time, to and including August 17, 2015, within which to file its response to Plaintiffs’ June 18, 2015 motion to remove the “Protected Information” designation from certain Grant Thornton documents (the “De-Designation Motion”). Grant Thornton’s response is currently due on July 13, 2015. Plaintiffs oppose an enlargement of time beyond July 27, 2015.

There is good cause for an enlargement of time, given that the discovery period in this case has been extended to September 4, 2015, and the parties and Grant Thornton are working diligently to complete multiple responsibilities related to discovery. Moreover, the additional time would make the briefing of this motion the same as at least one other motion to remove the protected designation from documents produced in discovery in this case.

For these reasons, we request that the Court extend the deadline for Grant Thornton to respond to the De-Designation Motion by 35 days, to August 17, 2015.

Dated: New York, New York  
July 13, 2015

Respectfully submitted,

s/ Richard B. Harper

---

Richard B. Harper  
BAKER BOTTS L.L.P.  
30 Rockefeller Plaza  
New York, NY 10112-4498  
Tel.: (212) 408-2675  
Fax: (212) 259-2475  
richard.harper@bakerbotts.com

*Attorneys for Grant Thornton LLP*

*Of Counsel:*

Jessica F. Rosenbaum  
BAKER BOTTS L.L.P.  
30 Rockefeller Plaza  
New York, NY 10112-4498  
Tel.: (212) 408-2586  
Fax: (212) 259-2586  
jessica.rosenbaum@bakerbotts.com