

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

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

JOINT MOTION FOR ENLARGEMENT OF TIME TO FILE JOINT STATUS REPORT

Pursuant to Rules 6(b) and 6.1 of the Rules of the United States Court of Federal Claims (RCFC), the parties respectfully request a 7-day enlargement of time, to and including January 28, 2016, within which to file a joint status report suggesting future proceedings in this case as directed by the Court in its order dated September 4, 2015 (ECF No. 240). The joint status report is currently due on January 21, 2016.

Good cause exists to grant the requested enlargement of time. Although the Court’s December 31, 2015 deadline for the completion of jurisdictional discovery has passed, to accommodate witnesses’ schedules, depositions that plaintiffs had originally noticed in December were conducted on January 14 and January 20, 2016. In addition, the parties have been engaged in briefing plaintiffs’ motion to compel, which was filed on November 23, 2015. The Government’s response to plaintiffs’ motion will be filed on January 21, 2016. These events have required significant attention by counsel from both parties. The requested enlargement will provide counsel with the necessary time to confer regarding the schedule of future proceedings and the content of the joint status report.

For these reasons, the parties request that the Court extend the deadline for the joint status report by 7 days, to and including January 28, 2016.

BENJAMIN C. MIZER
Principal Deputy Assistant Attorney General

s/ Robert E. Kirschman, Jr.
ROBERT E. KIRSCHMAN, JR.
Director

s/ Kenneth M. Dintzer
KENNETH M. DINTZER
Deputy Director
Commercial Litigation Branch
U.S. Department of Justice
P.O. Box 480 Ben Franklin Station
Washington, D.C. 20044
(202) 616-0385
(202) 307-0972 fax
KDintzer@CIV.USDOJ.GOV

Attorneys for Defendant

Date: January 20, 2016

Respectfully submitted,

s/ Charles J. Cooper
Charles J. Cooper
Counsel of Record for Plaintiffs
COOPER & KIRK, PLLC
1523 New Hampshire Avenue, N.W.
Washington, D.C. 20036
(202) 220-9600
(202) 220-9601 (fax)
ccooper@cooperkirk.com

Of counsel:
Vincent J. Colatriano
David H. Thompson
Peter A. Patterson
William C. Marra
COOPER & KIRK, PLLC
1523 New Hampshire Avenue, N.W.
Washington, D.C. 20036
(202) 220-9600
(202) 220-9601 (fax)