

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

OWL CREEK ASIA I, L.P., <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	No. 18-281 C
	)	(Judge Sweeney)
v.	)	
	)	
THE UNITED STATES,	)	
	)	
Defendant.	)	

**DEFENDANT’S UNOPPOSED MOTION FOR ENLARGEMENT OF TIME**

Pursuant to Rules 6(b) and 6.1 of the Rules of the United States Court of Federal Claims (RCFC), defendant, the United States, respectfully requests a 66-day enlargement of time, to and including June 29, 2018, within which to file its response to plaintiffs’ complaint. The United States’ response is currently due on April 24, 2018. This is our first request for an enlargement of time for this purpose. Counsel for plaintiffs has represented that plaintiffs do not oppose this motion.

There is good cause to grant the enlargement of time requested. On April 23, 2018, plaintiffs filed an unopposed motion to coordinate this case with numerous other related cases previously filed in this Court. Pls. Joint Unopposed Mot. to Coordinate, Apr. 23, 2018, ECF No. 7. In their motion, plaintiffs specifically request that this case “be governed by the briefing schedule set forth in the Court’s February 21, 2018 scheduling orders” entered in the related cases. *Id.* at 3; *see, e.g.,* Order, *Fairholme Funds, Inc., et al., v. United States*, No. 13-465, ECF No. 399 (Scheduling Order). Pursuant to that briefing schedule, the Government’s omnibus motion to dismiss is due on or before June 29, 2018, responses to the motions to dismiss are due on or before September 20, 2018, and the Government’s reply is due on or before December 19, 2018. *See* Mot. to Coordinate at 5; Scheduling Order at 1.

If the Court grants plaintiffs' unopposed motion to coordinate, and aligns the briefing schedule as requested by plaintiffs in their motion, the Government's response to plaintiffs' complaint will automatically be extended until the deadline for the filing of the omnibus motion to dismiss contemplated by the Scheduling Order. Because the Court may not have acted upon plaintiffs' unopposed motion before the time expires for filing the Government's response to plaintiffs' complaint, we are filing this unopposed motion in an abundance of caution. Granting the requested enlargement of time will promote judicial economy and will not prejudice any party.

For these reasons, we respectfully request that – if not mooted by events – the Court grant this unopposed request for a 66-day enlargement of time, to and including June 29, 2018, within which the Government may file its response to plaintiffs' complaint.

Respectfully submitted,

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