

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

SANDRA GARZA, individually
and as the personal representative of
THE ESTATE OF BRIAN SICKNICK

Plaintiff,

v.

DONALD J. TRUMP, ET. AL.

Defendants.

Civil Action No. 1:23-cv-00038-APM

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE ANSWER OR
RESPONSIVE PLEADING**

Pursuant to Federal Rules of Civil Procedure Rule 6(b)(1)(B), Defendant, Julian Elie Khater respectfully requests an enlargement of time of thirty (30) days, to and including March 20, 2023, within which to file an answer or other responsive pleading to the Plaintiff's Complaint.

Good cause and excusable neglect exist to grant this request. Mr. Khater was served on January 26, 2023 while incarcerated. Counsel for the Defendant was retained on February 16, 2023. Mr. Khater is currently incarcerated with the DC Department of Corrections. Mr. Khater's incarceration significantly delayed his ability and means to retain counsel. As such, Defendant's counsel requires additional time to communicate with Mr. Khater and prepare an appropriate response to the Plaintiff's Complaint.

On February 17, 2023, counsel for the Plaintiff, Mr. Mark S. Zaid indicated that the Plaintiff has no objection to this request for an extension of time. This is Defendant's first request for an extension in this regard. For these reasons, Plaintiff requests a thirty (30) day

extension, to and including March 20, 2023, within which to file an answer or responsive pleading in this matter.

WHEREFORE, based on the foregoing, Defendant respectfully requests that the motion for enlargement be granted.

Respectfully Submitted,

/s/David P. Sheldon

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I, undersigned, hereby certify that a true and correct copy of the foregoing was filed electronically with the Court's ECF electronic filing system and delivered electronically to counsel of record for the Plaintiff listed below this 17th day of February 2023:

Matthew G. Kaiser
mkaiser@kaiserdillon.com

/s/David P. Sheldon
David P. Sheldon