

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

SANDRA GARZA

\*

Plaintiff

\*

v.

\*

Case No.: 1:23-cv-00038-APM

DONALD J. TRUMP, et al.,

\*

Defendants

\*

\* \* \* \* \*

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

Pursuant to Federal Rules of Civil Procedure Rule 6(b)(1)(B), Defendant, George Pierre Tanios respectfully requests an enlargement of time of forty-seven (47) days, to and including May 10, 2023, within which to file an answer or other responsive pleading to the Plaintiffs Complaint. This extension will place Defendant Tanios on the same pleading schedule as Defendant Khater.

Good cause exists to grant this request. Defendant Tanios was served on or about March 4, 2023. Counsel for the Defendant was retained on March 23, 2023. As such, Defendant's counsel requires additional time to communicate with Defendant Tanios and prepare an appropriate response to the Plaintiff's Complaint.

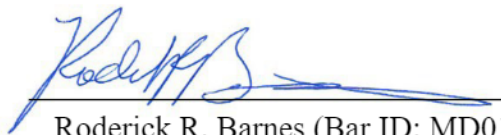
On March 23, 2023, the undersigned and counsel for the Plaintiff, Mr. Matthew Kaiser, conferred and agreed upon the following pleading schedule:

- Defendant's Answer or Preliminary Motion due 5/10/23;
- Plaintiff's Opposition to Preliminary Motion due 5/31/23;
- Defendant's Reply to Plaintiff's Opposition due 6/10/23.

Plaintiff's counsel has indicated that the Plaintiff has no objection to this request for an extension of time and pleading schedule as it places Defendant Tanios on the same pleading schedule as Plaintiff previously agreed with Defendant Khater. This is Defendant's first request for an extension in this regard. For these reasons, Plaintiff requests a forty-seven (47) day extension, to and including May 10, 2023, within which to file an answer or responsive pleading in this matter. If a preliminary Motion is filed, then Plaintiff shall have until May 31, 2023 to file an Opposition and Defendant shall file his Reply, if any, on or before June 6, 2023.

WHEREFORE, based on the foregoing, Defendant George Pierre Tanios respectfully requests that this motion for enlargement and modified schedule be granted.

Respectfully submitted,



Roderick R. Barnes (Bar ID: MD0158)  
Rollins, Smalkin, Richards & Mackie,  
L.L.C. 300 E. Lombard Street, Suite 900  
Baltimore, MD 21202  
Ph: (410) 727-2443  
Fx: (410) 727-8390  
[rbarnes@rsm.com](mailto:rbarnes@rsm.com)

*Attorneys for Defendant George Pierre Tanios*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 24<sup>th</sup> day of March 2023, a copy of the foregoing Motion and proposed Order were served via the Court's e-filing to:


Matthew Kaiser, Esquire  
Noah Brozinsky, Esquire  
KaiserDillon PLLC  
1099 Fourteenth Street, NW, 8<sup>th</sup> Floor  
Washington, DC 20005

Philip Andonian, Esquire  
Joseph Caleb, Esquire  
CalebAndonian PLLC  
1100 H Street, N.W., Suite 315  
Washington, DC 20005

Mark S. Zaid, Esquire  
Bradley P. Moss, Esquire  
Mark S. Zaid, P.C.  
1250 Connecticut Ave., NW, Suite 700  
Washington, DC 20036  
*Attorneys for Plaintiff*

Jesse R. Binnall, Esquire  
Binnall Law Group  
717King Street, Suite 200  
Alexandria, VA 22314  
*Attorney for Defendant Donald J. Trump*

David Patrick Sheldon, Esquire  
Law Offices of David P. Sheldon, PLLC  
100 M Street, SE, Suite 600  
Washington, DC 20003  
*Attorney for Defendant Julian Elie Khater*

  
Roderick R. Barnes (Bar ID: MD0158)