

**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,)
JULIAN KHATER,)
and GEORGE TANIOS,)
))
Defendants.)

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

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

Pursuant to Federal Rules of Civil Procedure Rule 6(b)(1)(A), Defendant, Julian Elie Khater, respectfully requests a third enlargement of time of seven (7) days, to and including June 7, 2023, within which to file an answer or other responsive pleading to the Plaintiff’s Complaint.

Good cause exists to grant this request. Defendant, Julian Khater, is currently incarcerated. Mr. Khater’s incarceration significantly impairs his ability and means to consult with counsel. Due to the limitations placed by Plaintiff’s confinement facility, Defendant’s counsel has only been able to speak to Mr. Khater by phone on two occasions, and the second occasion was cut short due to a regularly scheduled inmate count. Defendant’s counsel will not be able to speak to Mr. Khater again until on or about June 5, 2023. As such, Defendant’s counsel requires additional time to communicate with Mr. Khater so Mr. Khater has an opportunity to meaningfully participate in his response to the Plaintiff’s Complaint.

On May 25, 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 third request for an

extension in this regard. For these reasons, Plaintiff requests a seven (7) day extension, to and including June 7, 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.

A proposed order is attached.

Respectfully submitted,

/s/David P. Sheldon

David P. Sheldon (DC Bar # 446039)

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Attorney 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 26th day of May 2023:

Mark S. Zaid
mark@markzaid.com

/s/ David P. Sheldon
David P. Sheldon