

**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)

**FOURTH UNOPPOSED 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 fourth enlargement of time of twenty (20) days, to and including June 27, 2023, within which to file an answer or other responsive pleading to the Plaintiff’s Amended 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 Defendant’s confinement facility, Defendant’s counsel has only been able to speak to Mr. Khater by phone on three occasions, and the second occasion was cut short due to a regularly scheduled inmate count. Defendant’s counsel has only had one opportunity to consult with Mr. Khater since the Plaintiff filed her Amended Complaint on May 31, 2023. The Amended Complaint contains factual allegations and causes of action not included in the previous Complaint. As such, Defendant’s counsel requires additional time to

communicate with Mr. Khater so that Mr. Khater has an opportunity to meaningfully participate in his response to the Plaintiff's Amended Complaint.

On June 5, 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 fourth request for an extension in this regard. For these reasons, Plaintiff requests a twenty (20) day extension, to and including June 27, 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 7th day of June 2023:

Mark S. Zaid
mark@markzaid.com

/s/David P. Sheldon
David P. Sheldon