

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

NATIONAL FEDERATION OF  
INDEPENDENT BUSINESS,  
Plaintiff,

v.

DOROTHY DOUGHERTY, in her official  
capacity as Deputy Assistant Secretary of  
Labor for the Occupational Safety and  
Health Administration, *et al.*,  
Defendants.

Civil Action No. 3:16-cv-02568-D

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION**

Defendants move this Court under Federal Rule of Civil Procedure 6(b)(1)(A) to extend by 30 days all remaining deadlines in this case, including defendants' answer, which is currently due by February 17, 2017. The extension on the deadline for defendants to answer is necessary to allow incoming leadership personnel at the United States Department of Labor adequate time to consider the issues. Defendants have conferred with counsel for plaintiff regarding the request for extension on the answer, and plaintiff has no objection to the request provided that all other deadlines for the case be extended by 30 days as well. The parties agree that a 30-day extension on the other deadlines is appropriate, as defendants' answer might aid subsequent proceedings in the case. Therefore, defendants request a 30-day extension on all deadlines.

Respectfully submitted,

JOHN R. PARKER  
UNITED STATES ATTORNEY

/s/ Lisa R. Hasday

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**CERTIFICATE OF CONFERENCE**

I certify that I conferred with Pacific Legal Foundation, counsel for plaintiff, by electronic mail on February 10, 2017. On February 13, 2017, Pacific Legal Foundation stated that plaintiff does not oppose the motion.

/s/ Lisa R. Hasday

Lisa R. Hasday

Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I certify that, on February 13, 2017, I electronically filed the foregoing document with the Clerk of Court for the United States District Court for the Northern District of Texas using the Court's electronic case filing system. That system sends a "Notice of Electronic Filing" to the following attorney in charge for plaintiff:

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/s/ Lisa R. Hasday

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