

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

MASHPEE WAMPANOAG TRIBE,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 1:18-cv-2242-RMC
	)	
RYAN ZINKE in his official capacity	)	
as Secretary of the Interior, and	)	
UNITED STATES DEPARTMENT	)	
OF THE INTERIOR,	)	
	)	
Defendants.	)	

**UNOPOSED MOTION FOR EXTENSION OF TIME**

Defendants Ryan Zinke and the United States Department of the Interior hereby move the Court for a thirty-one day enlargement of time, up to and including January 9, 2019, for Defendants to answer or otherwise respond to Plaintiff Mashpee Wampanoag Tribe’s complaint (ECF No. 1). In support of this motion, Defendants state as follows:

1. Plaintiff filed its complaint on September 27, 2018 (ECF No. 1), and served the United States Attorney for the District of Columbia on October 10, 2018 (ECF No. 4). Defendants’ answer or other response to Plaintiff’s complaint is therefore due December 9, 2018.
  
2. Pursuant to LCvR 7(m), the undersigned counsel has conferred on this motion with counsel for Plaintiff, who indicated that Plaintiff consents to the extension of time.

3. Plaintiff's complaint is 19 pages long and requires analysis of numerous complex issues and investigation into extensive factual background.

4. The undersigned counsel entered on duty with the United States Department of Justice on October 15, 2018, and needs additional time to prepare Defendants' answer or other response to the complaint.

5. In addition, Interior leadership and other agency personnel need additional time to help prepare and review Defendants' responsive filing.

6. No other extensions have been granted to Defendants. The requested extension will not impact previously set deadlines or prejudice the parties, and is made in good faith.

Respectfully submitted on this 20th day of November, 2018.

JEAN WILLIAMS  
Deputy Assistant Attorney General  
Environment & Natural Resources Division

/s/ Sara E. Costello  
SARA E. COSTELLO  
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**CERTIFICATE OF SERVICE**

I hereby certify that on November 20th, 2018, a copy of the foregoing was filed through the Court's CM/ECF management system and electronically served on counsel of record.

/s/ Sara E. Costello  
Sara E. Costello  
Trial Attorney