

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ANIMAL WELFARE INSTITUTE, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Civ. No. 03-2006 (EGS/JMF)
)	
FELD ENTERTAINMENT, INC.,)	
)	
Defendant.)	
)	

**KATHERINE MEYER AND MEYER GLITZENSTEIN
& CRYSTAL'S MOTION FOR AN EXTENSION OF TIME**

By Minute Order dated December 11, 2013, the Court granted the motion of Animal Welfare Institute, Animal Protection Institute, and Fund for Animals (“Organizational Plaintiffs”) to extend the time by when they must respond to the motion of Feld Entertainment, Inc. (“FEI”) for attorneys’ fees. Katherine Meyer and Meyer Glitzenstein & Crystal (collectively “MGC”) hereby request that the Court likewise extend the time for their response to FEI’s motion so that it is due on the same schedule as the Organizational Plaintiffs.

With regard to its work in connection with one part of a single motion to compel, FEI claims that it is entitled to recover more than \$ 133,000 from MGC. *See* ECF No. 635 at 1. Although some of the issues that will be addressed in the Organizational Plaintiffs’ response to FEI will not be relevant to MGC’s response, others clearly will be. Accordingly, as contemplated by the original briefing schedule, the most efficient path forward will be for all of the issues to be briefed and resolved by all parties on the same schedule. To take just one example, it would make no sense at all for the Court to have to decide the appropriate hourly rate for a fee award twice: once in response to briefing by these movants and later in response to

briefing by the Organizational Plaintiffs.

In addition, below-signed counsel will also coordinate with counsel for the Organizational Plaintiffs concerning issues that are relevant to both responses.

Counsel for FEI has been contacted concerning FEI's position and has indicated that FEI objects to the relief being sought herein.¹

A proposed order granting this extension is attached.

Respectfully submitted,

/s/Stephen L. Braga
Stephen L. Braga
(D.C. Bar No. 366727)
Kathleen M. Braga
(D.C. Bar No. 418830)
Law Office of Stephen L. Braga, LLC
3079 Woods Cove Lane
Woodbridge, VA 22192
703-623-2180
bragalaw@gmail.com

¹ FEI's counsel indicated that FEI does not object to a fourteen-day extension.