

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

FACEBOOK, INC.

Defendant.

Civil Action No. 1:20-cv-03590 (JEB)

**FEDERAL TRADE COMMISSION'S UNOPPOSED MOTION FOR AN EXTENSION
OF TIME TO FILE AN AMENDED COMPLAINT**

On June 28, 2021, the Court dismissed Plaintiff Federal Trade Commission's complaint without prejudice, and provided Plaintiff until July 29, 2021 to file an amended complaint. ECF No. 72. Pursuant to Federal Rule of Civil Procedure 6(b)(1), Plaintiff respectfully moves this Court for an extension of time of 21 days until August 19, 2021 to file an amended complaint. Pursuant to Local Civil Rule 7(m), Plaintiff conferred with counsel for Defendant Facebook, Inc. ("Facebook") regarding this requested extension, and Facebook does not oppose this motion, subject to the following understandings.

First, the parties have agreed to the following proposed schedule related to Facebook's response to an amended complaint: (1) Plaintiff shall file an amended complaint no later than August 19, 2021; (2) Facebook shall file its answer or otherwise respond to Plaintiff's amended complaint by October 4, 2021; (3) Plaintiff shall file its opposition to Facebook's motion to dismiss, if any, by November 17, 2021; and (4) Facebook shall file its reply, if any, by December 1, 2021. Second, Facebook reserves all rights as to the adequacy, legal validity, and appropriateness of any proposed amendment.

Plaintiff respectfully submits that good cause exists to extend until August 19, 2021 the deadline to file an amended complaint. *See* Fed. R. Civ. P. 6(b)(1) (the Court may for good cause grant requests for time extension made before the original time expires). The requested extension will provide sufficient time for Plaintiff to complete internal agency processes with respect to filing an amended complaint. Further, the parties have agreed to a schedule for a response to the amended complaint and any necessary briefing thereafter as described above. The modest extensions requested will not burden or prejudice Defendant or any third parties, and are consistent with the just, speedy, and inexpensive determination of this action. *See* Fed. R. Civ. P. 1.

For the foregoing reasons, Plaintiff respectfully requests that the Court grant this motion.

DATED: July 23, 2021

Respectfully submitted,

/s/ Krisha Cerilli

Krisha Cerilli (D.C. Bar 983281)

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CERTIFICATE OF SERVICE

I hereby certify that on July 23, 2021, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

/s/ Krisha Cerilli
Krisha Cerilli (D.C. Bar 983281)

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**[PROPOSED] ORDER GRANTING FEDERAL TRADE COMMISSION'S MOTION
FOR AN EXTENSION OF TIME**

Upon consideration of Plaintiff Federal Trade Commission's Motion for an Extension of Time to File an Amended Complaint, the consent motion is GRANTED. Accordingly, (1) Plaintiff shall file an amended complaint by August 19, 2021; (2) Defendant shall file its answer or otherwise respond to Plaintiff's amended complaint by October 4, 2021; (3) Plaintiff shall file its opposition to Defendant's motion to dismiss, if any, by November 17, 2021; and (4) Defendant shall file its reply, if any, by December 1, 2021.

IT IS SO ORDERED.

Dated: _____, 2021

James E. Boasberg
United States District Judge

ATTORNEYS TO BE NOTIFIED

Plaintiff

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