

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

Dr. ORLY TAITZ, Esq.	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil No. 13-1020 (RCL)
	)	
PATRICK DONAHOE, Postmaster General, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	

**MOTION TO SET BRIEFING SCHEDULE**

“FOIA actions are typically and appropriately resolved on summary judgment.”  
*Landmark Legal Foundation v. EPA*, 43 ELR 20199, 2013 U.S. Dist. LEXIS 114458 at  
\*12 (D.D.C. Aug. 14, 2013) (Lamberth, J.). This case should be no different, and  
Defendants respectfully request the Court enter the attached scheduling order setting  
forth a briefing schedule as follows:

- Defendants’ Summary Judgment Motion due no later than December 13, 2013;
- Plaintiff’s Opposition due no later than January 3, 2014;
- Defendants’ Reply due no later than January 24, 2014.

Entry of this schedule will advance the interests of the parties and the Court in an  
efficient and economical resolution of this action on the merits.<sup>1</sup>

<sup>1</sup> Pursuant to Local Civil Rule 7(m), undersigned counsel consulted with Plaintiff regarding her position on this motion. Citing her pending motion for default judgment, *see* dkt. no. 4, she declined to consent and did not propose an alternative schedule. In Defendants’ view, that motion should be denied for the reasons set forth in Defendants’ Notice Regarding Service of Complaint, dkt. no. 6, thereby resolving Plaintiff’s objection to the proposed schedule.

Dated: November 13, 2013

Respectfully submitted,

STUART F. DELERY  
Assistant Attorney General

ELIZABETH J. SHAPIRO  
Deputy Branch Director

*/s Eric J. Soskin*

ERIC J. SOSKIN (PA Bar 200663)  
United States Department of Justice  
Civil Division, Federal Programs Branch  
20 Massachusetts Avenue, N.W.  
Washington, D.C. 20530  
Tel: (202) 353-0533  
Fax: (202) 305-2685  
Email: Eric.Soskin@usdoj.gov

Attorneys for Defendants