

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

HISTORY ASSOCIATES INCORPORATED,

Plaintiff,

v.

FEDERAL DEPOSIT INSURANCE  
CORPORATION,

Defendant.

Case No. 1:24-cv-1857-ACR

**CONSENT MOTION FOR EXTENSION OF TIME**

The Federal Deposit Insurance Corporation (“FDIC”) respectfully moves the court to extend briefing deadlines in this case and as grounds therefore states as follows:

1. On July 9, 2025, the FDIC filed a Motion for Summary Judgment on Count I and a Motion to Dismiss Count II of the Amended Complaint. (ECF No. 72).

2. On July 30, 2025, History Associates Inc. (“HAI”) filed a Cross-Motion for Summary Judgment on Count I, In Opposition to the FDIC’s Motion for Summary Judgment on Count I, and Opposition to the FDIC’s Motion to Dismiss Count II (ECF No. 76) (“Cross-Motion”), and a Motion for Leave to Take Discovery (ECF No. 77) (“Motion for Leave”).

3. Under the Scheduling Order (ECF No. 77) and the Local Rules, the FDIC’s responses to the Cross-Motion and the Motion for Leave are currently due August 13, 2025.

4. Pursuant to Local Civil Rule 7(m), counsel for the FDIC conferred with counsel for HAI and the parties agreed to extend the FDIC’s time to respond until August 27, 2025, and to extend HAI’s time to file reply briefs until September 17, 2025. A proposed order is attached.

5. This is the first request for an extension of time regarding this briefing by either party and is not interposed for the purposes of delay.

Therefore, for good cause shown, the FDIC respectfully moves the Court to grant its Consent Motion to enter the attached Scheduling Order.

Dated August 1, 2025

Respectfully submitted,

Andrew J. Dober, D.C. Bar # 489638  
Senior Counsel

/s/ Lina Soni

Lina Soni, D.C. Bar #503298  
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*Attorneys for the FDIC*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 1, 2025, I caused a true and correct copy of the foregoing to be filed with the Clerk for the U.S. District Court for the District of Columbia through the ECF system. Participants in the case who are registered ECF users will be served through the ECF system, as identified by the Notice of Electronic Filing.

/s/ Lina Soni  
Lina Soni

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**PROPOSED AMENDED SCHEDULING ORDER**

For good cause shown, Federal Deposit Insurance Corporation's ("FDIC") Motion to Extend Dates in Scheduling Order is **GRANTED** and the Court's June 5, 2025 Scheduling Order (ECF Doc. 67) is hereby amended and the Court **ORDERS** that:

1. By **August 27, 2025**, the FDIC shall file its reply brief in support of its dispositive motion(s) and/or opposition to any cross-motion for summary judgment filed by History Associates. Also by **August 27, 2025**, the FDIC shall file its response to History Associates Motion for Leave to Take Discovery (ECF Doc. 77).
2. By **September 10, 2025**, History Associates shall file its reply brief in support of any cross-motion for summary judgment and its reply brief in support of its Motion for Leave to Take Discovery.

SO ORDERED:

Date:

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HON. ANA C. REYES  
United States District Judge