

**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

**FDIC’S UNOPPOSED MOTION TO EXTEND TIME FOR RESPONDING TO MOTION  
BY THREE DAYS**

The FDIC is requesting a 3-day unopposed extension to and including May 15, 2025, in which to file an opposition to Intervenor Michael Williams’ motion and memorandum, Dkt. Nos. 58 & 59, respectively. On April 28, 2025, Mr. Williams filed a 28-page “Motion for Relief Pursuant to Federal Rules of Civil Procedure 59(e) and 60(b), and under this Court’s Inherent Authority to Grant Relief.” Dkt. No. 58. Three days later, Mr. Williams filed a 63-page memorandum in support of his motion. Dkt. No. 59. Thus, the FDIC’s response is due, at the earliest, on May 12, 2025. Standing Order at 9(b)(i). This motion is being made “before the original time . . . expires,” Fed. R. Civ. P. 6(b)(1)(A), and is being filed “at least 4 days prior to the deadline,” Standing Order at 9(b). This is the FDIC’s first request for an extension. Standing Order at 9(b)(ii). There is no scheduling order in the case as it is a FOIA case and no other currently existing court deadlines will be impacted by this request. Standing Order at 9(b)(iv). Mr. Williams does not oppose this request. *See* Exhibit A; Standing Order at 9(b)(vi); LCvR 7(m).

There is good cause for this brief 3-day extension. First, the FDIC did not receive Mr. Williams’ full briefing until May 1, 2025. This 3-day extension request would provide the FDIC

with the amount of time contemplated under the Local Rules. LCvR 7(a) (“Each motion shall include or be accompanied by a statement of the specific point and authority that support the motion”); 7(b) (opposition due within 14 days of the date of service). Second, the FDIC is responding to voluminous briefing. Third, Mr. Williams requested (Dkt. No. 54) and was granted a 14-day extension (April 16, 2025 Minute Order) and will not be prejudiced by this 3-day extension. Accordingly, the FDIC respectfully requests that the Court grant its unopposed motion for a brief 3-day extension of time to and including May 15, 2025, in which to file its opposition to Mr. Williams’ motion and memorandum, Dkt. Nos. 58 & 59, respectively.

Date: May 8, 2025

Respectfully submitted,  
Andrew J. Dober, D.C. Bar No. 489638  
Senior Counsel

/s/ Lina Soni

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 8, 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 CM/ECF system. All participants in the case are registered CM/ECF users and will be served through the CM/ECF system, as identified by the Notice of Electronic Filing.

/s/ Lina Soni  
Lina Soni

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**[PROPOSED] ORDER**

Upon consideration of the FDIC's Unopposed Motion to Extend Time to Respond to Motion by Three Days, the Court enters the following order:

It is HEREBY ORDERED that the FDIC's unopposed motion for a 3-day extension is GRANTED.

It is further ORDERED that the FDIC's deadline to file an opposition to Intervenor Michael Williams' "Motion for Relief Pursuant to Federal Rules of Civil Procedure 59(e) and 60(b), and under this Court's Inherent Authority to Grant Relief" and supporting memorandum, Dkt. Nos. 58 & 59, respectively, is May 15, 2025.

Dated: May \_\_, 2025

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THE HONORABLE ANA C. REYES  
U.S. District Court Judge