

2/22/83

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

HAROLD WEISBERG,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No. 78-0322
	:	
WILLIAM H. WEBSTER, ET AL.,	:	
	:	
Defendants	:	

HAROLD WEISBERG,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No. 78-0420
	:	
FEDERAL BUREAU OF INVESTIGATION,	:	(Consolidated)
ET AL.,	:	
	:	
Defendants	:	

MOTION FOR EXTENSION OF TIME WITHIN WHICH  
TO RESPOND TO DEFENDANTS' DISCOVERY

Comes now the plaintiff, Mr. Harold Weisberg, and moves the Court for an extension of time, to and including March 10, 1983, within which to respond to defendants' interrogatories and request for production of documents. As grounds for his motion, plaintiff states to the Court as follows:

1. By order dated February 4, 1983, this Court directed plaintiff to answer the interrogatories and request for production of documents served on plaintiff by defendants. Under the terms of the Court's order, plaintiff's response is due on or before February 24, 1983.

2. Plaintiff's counsel received this order on either February

7th or 8th. Immediately upon receipt of it he made plans to confer with his client about it at his client's home in Frederick, Maryland. (For health reasons Mr. Weisberg is no longer travels to Washington, D.C. or anywhere else except for medical care. On those occasions when he does come he has to arrange for special transportation as he is not able to drive here himself.) Initially this conference was scheduled for Friday, February 11th. However, on that date Washington, D.C. received approximately 24 inches of snow and Frederick, Maryland received up to 35.9 inches. As a result, the February 11 conference had to be cancelled. Although it was then rescheduled for February 14th, this meeting had to be cancelled for the same reason.

3. On February 11, 14 and 15 counsel's eight year-old daughter, who attends the Washington International School, was out of school due to the snowstorm. Counsel's wife, Lt. Col. May Lesar, a radiologist at Walter Reed Army Hospital, had to report for work on these days, and as a practical matter counsel had to take care of his daughter these days. The result was that counsel was unable to do little these three days except office filing and xerox chores. This loss of three days has created some time pressures which otherwise would not have existed, thus requiring postponement of his trip to Frederick until February 21, 1983.

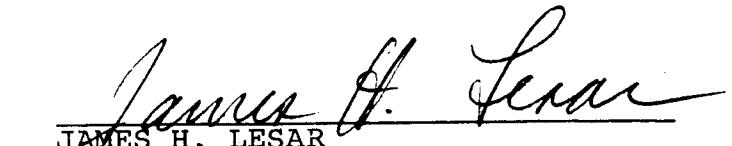
4. On February 21, 1983, counsel conferred with his client for several hours at Frederick. He intends to complete a draft of the response to defendants' discovery by the end of this week

and send it to his client. Because mailing back and forth takes several days, and because a second draft may be necessary, plaintiff is requesting an additional two weeks time within which to file plaintiff's response to the discovery requests.

5. Since defendants stated in their recent Rule 37(a)(4) motion that their counsel will, for the most part, be unavailable from February 21 through March 18, 1983, it would appear that there will be no prejudice to defendants if the requested extension is granted.

Accordingly, plaintiff requests that the Court grant his motion for an extension of time to and including March 10, 1983.

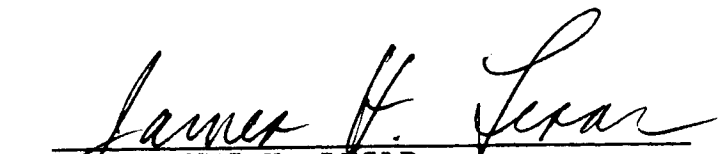
Respectfully submitted,

  
 JAMES H. LESAR  
 1000 Wilson Blvd., Suite 900  
 Arlington, Va. 22209  
 Phone: 276-0404

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I have this 22nd day of February, 1983, mailed a copy of the foregoing Motion for Extension of Time Within Which To Respond to Defendants' Discovery to Mr. Henry LaHaie, Civil Division, Room 3338, U.S. Department of Justice, Washington, D.C. 20530.

  
 JAMES H. LESAR

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 :  
 Defendants :

O R D E R

Upon consideration of plaintiff's motion for an extension of time and the entire record herein, it is by this Court this \_\_\_\_\_ day of \_\_\_\_\_, 1983, hereby

ORDERED, that plaintiff shall have to and including March 10, 1983, within which to file his response to defendants' interrogatories and request for production of documents.

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE