

IN THE
 UNITED STATES COURT OF APPEALS
 FOR THE DISTRICT OF COLUMBIA

HAROLD WEISBERG,	:	
	:	
Appellant	:	
	:	
v.	:	Civil Action No. 82-1072
	:	
U.S. DEPARTMENT OF JUSTICE,	:	
ET AL.,	:	
	:	
Appellees	:	

APPELLANT'S MOTION FOR EXTENSION OF TIME
 WITHIN WHICH TO FILE REPLY BRIEF

Comes now the appellant, Mr. Harold Weisberg, and moves the Court for an extension of time of thirty days, to and including July 14, 1982, within which to file his Reply Brief in this case. As grounds for his motion, appellant represents to the Court as follows:

1. Appellant's Reply Brief is presently due on June 14, 1982.
2. Because of the press of other business, appellant's counsel was unable to find time even to read appellee's brief until June 11, 1980.
3. This review of appellee's brief makes it apparent that appellant's counsel will be required to make a detailed search to ferret out facts long buried in the seven year history of this case

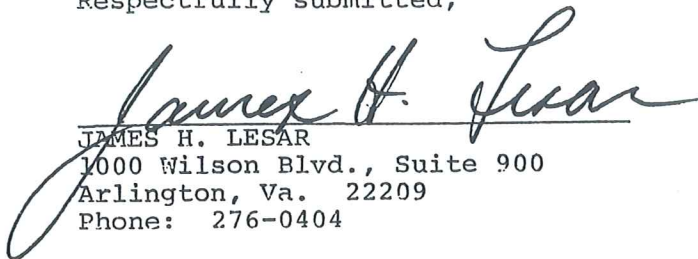
before he can begin to write the Reply Brief, and that the writing of the Reply Brief will likely take more time than usual.

4. Appellant's counsel has a very busy schedule for the next month. He is currently involved in international efforts being made to stop the deportation to the Philippines of a former Philippine diplomat being held in jail in Australia. This has involved--and will continue to involve--time-consuming phone consultations with attorneys and representatives of civil organizations here, in New York City, and in Australia. He also has briefs due on issues of major importance in G. Robert Blakey v. Department of Justice, et al., Civil Action No. 81-2174, and Mark A. Allen v. Department of Defense, et al., Civil Action No. 81-2543. And it is virtually certain that within the month he will also have to file a brief of major importance on novel issues of law in Allen v. Department of Justice, et al., Civil Action No. 81-1206.

5. Finally, appellant's counsel intends to file within the next couple of days a motion seeking leave to refer in his Reply Brief to a recently obtained Department of Justice Memorandum which he believes are relevant to issues presented by this case. Granting the extension sought will enable appellee's to respond to this motion and this Court to act upon it before appellant must submit his brief. On the basis of past experience, appellant believes that this procedure is preferable to including the material in his Reply Brief without the prior approval of this Court, as additional time will then be consumed by the inevitable motion to strike such material from the Reply Brief.

Accordingly, appellant requests that his motion for extension of time be granted.

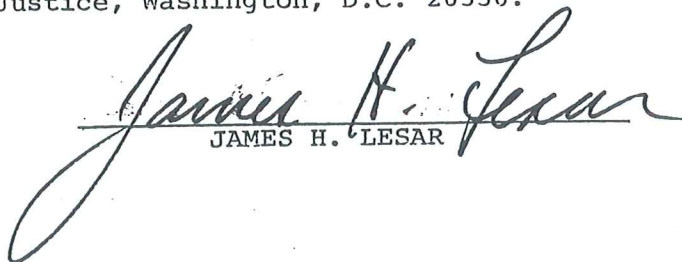
Respectfully submitted,


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

Attorney for Appellant

CERTIFICATE OF SERVICE

I hereby certify that I have this 11th day of June, 1982, mailed a copy of the foregoing Motion for Extension of Time Within Which to File Reply Brief to Mr. William G. Cole, Civil Division, U.S. Department of Justice, Washington, D.C. 20530.


JAMES H. LESAR