

SAPF supply the basis for the motion to compel and state which responses were considered inadequate. SAPF failed to do so. The parties agreed that SAPF's counsel would call on March 31, 2006, to informally discuss the motion to compel discovery. SAPF's counsel failed to call at the agreed time; and, when he later called, stated only that he intended to file the motion to compel without specifying which responses he considered inadequate.

This Court does not require filing motions to extend time but "no extension of time limits set in any scheduling order entered by the Court shall be made without the Court's prior approval."¹

On April 4, 2006, SAPF's counsel agreed to a thirty-day extension for the United States' response to the motion to compel.

Respectfully submitted,

ROD J. ROSENSTEIN

United States Attorney

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CERTIFICATE OF SERVICE

¹ L.R. 104.8.a.

IT IS HEREBY CERTIFIED that service of the foregoing MOTION TO EXTEND has been made upon the following by depositing a copy in the United States mail, postage prepaid, this 10th day of April, 2006.

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