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VIA ECF

June 21, 2006

Joseph A. Greenaway, Jr.
U.S. District Court
King Courthouse Bldg
Newark, N.J. 07102

Re: Elhassan v. Porter Goss, et al
Civil Action No. 06-1000

Dear Judge Greenaway:

On May 30, 2006, defendants Porter Goss and the Central Intelligence Agency filed a motion to dismiss. The motion was returnable on June 26, 2006 and therefore, pursuant to Local Rule 7.1(d)(2), plaintiff's response in opposition was due on or before June 12, 2006. Plaintiff's response was not filed until June 19, 2006,¹ which was the date that defendants' reply would have been due if plaintiff had timely filed. Local Rule 7.1(d)(3). It does not appear that plaintiff sought an extension of time or informed the Court that he was taking an extension of time as required by Local Rule 7.1(d)(5).

Because plaintiff's late filing of his response prohibits defendants from timely filing their reply, it is requested that the return date of the motion be adjourned until July 10, 2006 and that the defendants therefore be granted until July 3, 2006 to file their reply papers.

Respectfully,

CHRISTOPHER J. CHRISTIE
United States Attorney
s/ Susan Handler-Menahem
SUSAN HANDLER-MENAHEM
Assistant U.S. Attorney

cc: Khalid Elhassan, pro se
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¹ Although defendants' counsel received plaintiff's brief by electronic filing, the affidavit plaintiff claims to have filed was not electronically filed and as of this date, defendant is still awaiting its receipt pursuant to plaintiff's certificate of service.