

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

GUADELUPE L. GARCIA, JR., et al.)

Plaintiffs,)

v.)

ANN M. VENEMAN, Secretary of the)
United States Department of Agriculture,)

Defendant.)

Civil Action No. 1:00CV02445
Judge Robertson

FILED

MAY 29 2003

NANCY MAYER WHITTINGTON, CLERK
U.S. DISTRICT COURT

**DEFENDANT'S MOTION FOR A BRIEF EXTENSION OF TIME IN WHICH
TO FURTHER RESPOND TO PLAINTIFFS' PENDING DISCOVERY REQUESTS**

Defendant moves the Court for a brief extension of one week's time to complete two specific discovery tasks that are currently due to be completed on May 29, 2003. Specifically, defendant requires additional time to (1) answer those few interrogatories to which the Court specifically ordered defendants to respond at the April 29, 2003 status conference and to which defendant did not object; and (2) to compile her specific objections to the remainder of plaintiffs' voluminous interrogatories and document requests. Defendant explained the nature of these objections in the briefing on these matters and at the April 29 status conference.

Since the April 29, 2003 status conference, defendant has produced, or made available for plaintiffs' inspection, more than 50,000 pages of documents in response to plaintiffs' discovery requests. These documents include the thirty-seven borrower files defendant described at the April 29 hearing, as well as regulations, notices, policy statements, and guidance relating to loan making, loan servicing and USDA document retention policies. They also include materials responsive to plaintiffs' Interrogatories numbers 4, 10, and 11, as well as plaintiffs' Requests for Production of Documents numbers 13, 14, 25, and 29. Defendant's production of additional

94

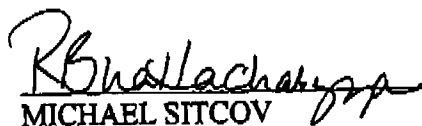
information that is responsive to plaintiff's voluminous discovery requests is ongoing, and the brief extension of time requested herein will not delay that process.

Defendants seek an extension of one week's time, until June 5, 2003, in which to complete the two specific tasks identified herein. This request is reasonable, will not prejudice either party, and will not unduly delay this case. A proposed order granting the relief requested herein is attached for the convenience of the Court.

RESPECTFULLY SUBMITTED,

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Dated: May 29, 2003

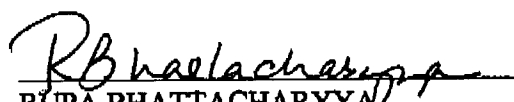
CERTIFICATE OF SERVICE

I certify that on May 29, 2003, a copy of the foregoing DEFENDANT'S MOTION FOR A BRIEF EXTENSION OF TIME IN WHICH TO FURTHER RESPOND TO PLAINTIFFS' PENDING DISCOVERY REQUESTS was served upon counsel of record by facsimile and first-class mail, postage prepaid.

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