

UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF COLUMBIA

**David Geier And Mark Geier**

14 Redgate Court  
Silver Spring, MD 20905

*Plaintiffs,*

vs.

**Department of Health and Human  
Services**

200 Independence Avenue, SW  
Washington, DC 20201

**Dr. Sarah K. Parker and  
Dr. James Todd**

Childrens' Hospital  
Department of Pediatrics  
1056 East 19th Avenue  
Denver, CO 80218

**Dr. Benjamin Schwartz and  
Dr. Larry Pickering**

c/o  
National Vaccine Program Office  
HHS  
200 Independence Ave., SW  
Room 725  
Washington, DC 20201

And

**The American Academy of  
Pediatrics**

601 13<sup>th</sup> Street, NW  
Suite 400 - North  
Washington, DC 20005

*Defendants.*

Plaintiffs' Consent Motion for a  
Second Extension of Time to File  
an Opposition to Defendant  
Parker and Todd's Motion to  
Dismiss

And

Plaintiffs' Consent to  
Defendants Parker and Todd  
Filing Their Reply to  
Plaintiffs' Opposition to Their  
Motion to Dismiss on January 10,  
2006.

Case No. 1:05CV01749

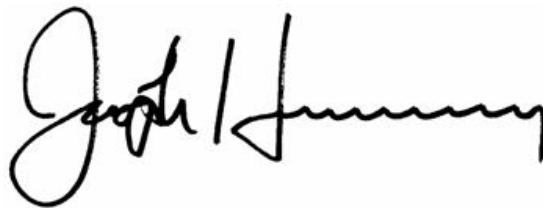
Judge Thomas F. Hogan

With the consent of all parties, Plaintiffs' hereby move that the Court grant an additional ten (10) days for Plaintiffs to file an Opposition to Defendants Todd and Parker's Motion to Dismiss for Lack of Personal Jurisdiction. Under this revised

schedule, Plaintiffs will file their Opposition to Defendants' Todd and Parker's Motion to Dismiss on December 12, 2005.

In consideration of the upcoming holiday season, Plaintiffs consent to an extension of time until January 10, 2006 for Defendants Todd and Parker file their Reply to Plaintiffs' Opposition to Defendant Todd and Parker's Motion to Dismiss.

Respectfully submitted this Wednesday, November 30, 2005.

A handwritten signature in black ink, appearing to read "Joseph Hennessey". The signature is written in a cursive, flowing style with a large initial "J".

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Joseph Hennessey  
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James A. Moody, Esq.  
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*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I, Joseph Hennessey certify that on Wednesday, November 30, 2005, a copy of Plaintiffs' Consent Motion for a Second Extension of Time to File an Opposition to Defendant Parker and Todd's Motion to Dismiss and Plaintiffs' Consent to Defendant Parker and Todd's Filing Their Reply to Plaintiffs' Opposition to Their Motion to Dismiss on January 10, 2006 was served by via the Electronic Filing System of the United States District Court for the District of Columbia on the below listed parties:

**Jay Ward Brown, Esq.**

**Adam J. Rappaport, Esq.**

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**Alan Burch, Esq.**

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**Erica H. Perkins, Esq.**

**Edward J. Longosz, Esq.**

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*Defendants.*

**Statement of Points and  
Authorities in Support of**  
Plaintiffs' Consent Motion for a  
Second Extension of Time to File  
an Opposition to Defendant  
Parker and Todd's Motion to  
Dismiss

And

Plaintiffs' Consent to Defendant  
Parker and Todd's Filing Their  
Reply to Plaintiffs' Opposition  
to Their Motion to Dismiss on  
January 10, 2006.

Case No. 1:05CV01749

Judge Thomas F. Hogan

Pursuant to Local Rule 7(a), Plaintiffs provide the  
following Statement of Points and Authorities in Support of  
Their Motion for a Second Extension of Time to File an

Opposition to Defendant Todd and Parker's Motion to Dismiss for Lack of Personal Jurisdiction.

- Plaintiffs' Counsel James A. Moody is currently in a trial in the State of California.
- Plaintiffs' Counsel Joseph Hennessey is recovering from a broken fibula which incapacitated him for a period of four weeks.
- Due to the trial schedule of Mr. Moody and the injury to Mr. Hennessey, it has been difficult for Plaintiffs counsel to confer with respect to filing an Opposition to Defendant Todd and Parker's Motion to Dismiss.
- Defendants Todd and Parker consent to Plaintiffs Request for additional time to file their Opposition brief.
- Given the upcoming holiday season, Defendants Todd and Parker sought Plaintiffs' permission to file their Reply Memorandum after the Christmas and New Year.
- Seeing no prejudice to their case, Plaintiffs have agreed that Defendants Todd and Parker should have until January 10, 2006 to file Their Reply to Plaintiffs' Opposition to

the Motion to Dismiss.

Respectfully submitted this Wednesday, November 30, 2005.

A handwritten signature in black ink, appearing to read "Joseph Hennessey". The signature is written in a cursive style with a large initial "J" and a long horizontal stroke at the end.

Joseph Hennessey  
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*Attorneys for Plaintiffs*

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*Plaintiffs,*

vs.

**Department of Health and Human  
Services, et al.**

*Defendants.*

Case No. 1:05CV01749

**ORDER**

Plaintiffs having filed an Unopposed Motion for additional time to file an Opposition to Defendant Todd and Parker's Motion to Dismiss for Lack of Personal Jurisdiction, and the Court finding good cause shown, and the Plaintiffs having consented to an extension of time for Defendants Todd and Parker to file their Reply to Plaintiffs' Opposition to Defendant Todd and Parker's Motion to Dismiss on January 10, 2006, the Court hereby

**ORDERS** that Plaintiffs Opposition to Defendant Todd and Parker's Motion to Dismiss will be filed on or before December 12, 2006'; the Court further

**ORDERS** that Defendants Parker and Todd shall file their Reply to Plaintiffs' Opposition to the Motion to Dismiss on January 10, 2006. Done this \_\_\_\_ day of \_\_\_\_\_, 2005.

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Judge, United States District Court