

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 13th Street, NW
Suite 400 - North
Washington, DC 20005

Defendants.

Plaintiffs' Consent Motion for
an Extension of Time to File an
Opposition to Federal
Defendants' Motion to Dismiss on
December 21, 2006

and

Plaintiffs' Consent to Federal
Defendants Filing Their Reply to
Plaintiffs' Opposition to
Federal Defendants' Motion to
Dismiss on January 11, 2006.

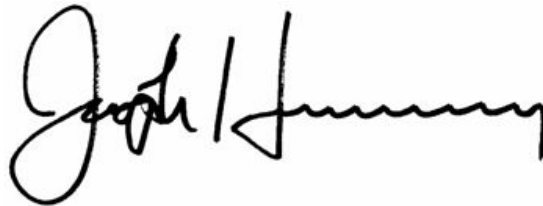
Case No. 1:05CV01749

Judge Thomas F. Hogan

With the consent of all parties, Plaintiffs' hereby move that the Court grant an extension until December 21, 2005 for Plaintiffs to file an Opposition to Federal Defendants' Motion to Dismiss. In consideration of the upcoming holiday season,

Plaintiffs consent to an extension of time until January 11, 2006 for Federal Defendants to file a Reply to Plaintiffs' Opposition to Federal Defendants' 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 "H".

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 an Extension of Time to File an Opposition to Federal Defendants' Motion to Dismiss on December 21, 2006, and Plaintiffs' Consent to Federal Defendants Filing Their Reply to Plaintiffs' Opposition to Federal Defendants' Motion to Dismiss on January 11, 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.

Levine Sullivan Koch & Schultz, LLP
1050 Seventeenth Street, NW, Suite 800
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Alan Burch, Esq.

55 Fourth Street, NW
Washington, DC 2-530

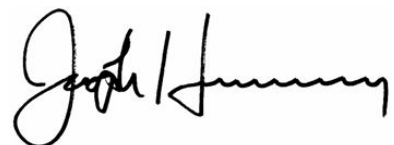
Erica H. Perkins, Esq.

Edward J. Longosz, Esq.

Eckert Seamans Cherin & Mellott, LLC
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Defendants.

**Statement of Points and
Authorities in Support of**
Plaintiffs' Consent Motion for
an Extension of Time to File an
Opposition to Federal
Defendants' Motion to Dismiss on
December 21, 2006

and

Plaintiffs' Consent to Federal
Defendants Filing Their Reply to
Plaintiffs' Opposition to
Federal Defendants' Motion to
Dismiss on January 11, 2006.

Case No. 1:05CV01749

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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 Federal Defendants' Motion to Dismiss.
- Federal Defendants consent to Plaintiffs Request for additional time to file their Opposition brief.
- Given the upcoming holiday season, Federal Defendants sought Plaintiffs' permission to file their Reply Memorandum after the Christmas and New Year.
- Seeing no prejudice to their case, Plaintiffs have agreed that Federal Defendants should have until January 11, 2006 to file Their Reply to Plaintiffs' Opposition to Federal

Defendants' 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
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Defendants.

Case No. 1:05CV01749

ORDER

Plaintiffs having filed an unopposed motion to extend until December 21, 2005 the time for filing an Opposition to Federal Defendants' Motion to Dismiss; and Plaintiffs having consented to Federal Defendants' filing their Reply to Plaintiffs' Opposition to Federal Defendants' Motion to Dismiss on or before January 11, 2006; and the Court finding good cause shown, the Court hereby

ORDERS that Plaintiffs Opposition to Federal Defendants' Motion to Dismiss shall be filed on or before December 21, 2005, and Federal Defendants Reply brief shall be filed on or before January 11, 2006. Done this ____ day of _____, 2005.

Judge, United States District Court