

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE SECOND CIRCUIT**

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E. JEAN CARROLL,	)	
	)	
Plaintiff - Appellee	)	
	)	
v.	)	
	)	
DONALD J. TRUMP,	)	Nos. 20-3977 & 20-3978
	)	
Defendant - Appellant	)	
	)	
UNITED STATES,	)	
	)	
Movant – Appellant.	)	
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**UNOPPOSED MOTION FOR 30-DAY EXTENSION OF TIME TO FILE  
REPLY BRIEF OF THE UNITED STATES**

Pursuant to Second Circuit Rule 27.1, the United States hereby respectfully moves for a 30-day extension of time, to and including June 7, 2021, for filing its reply brief. This motion is unopposed.

1. Plaintiff-appellee filed her brief on April 16, 2021. The reply brief of the United States is presently due May 7, 2021. We have not previously sought any extension of time.

2. Good cause exists for a 30-day extension of time because the attorney with primary responsibility for preparing the government’s brief, Joshua Salzman, has upcoming deadlines in a number of other cases that will make it extremely burdensome for him to prepare the government’s brief under the existing schedule.

These include: *In re Elisabeth DeVos*, No. 21-11239 (11th Cir.) (response to mandamus petition due April 23); *In re Elster*, No. 20-2205 (Fed. Cir.) (appellee brief due May 14, as already extended); *Jarkesy v. SEC*, No. 20-61007 (5th Cir.) (appellee brief due May 17, as already extended); *Family Rehabilitation v. Becerra*, No. 20-10271 (5th Cir.) (reply brief due May 27); *Springfield Hospital v. Carranza*, No. 20-3902 (2d Cir.) (reply brief due June 4); *Archbishop of Agana v. U.S. SBA*, No. 21-15418 (9th Cir.) (appellee brief due June 14). In addition, Mr. Salzman will be preparing to present oral argument on June 11 in *Decker Coal Co. v. Pebringer*, No. 2071449 (9th Cir.).

3. Counsel for the plaintiff E. Jean Carroll and defendant Donald J. Trump have authorized us to state that this motion is unopposed.

### CONCLUSION

For the foregoing reasons, the deadline for filing the government's reply brief should be extended to June 7, 2021.

Respectfully submitted,

MARK B. STERN

*/s/ Joshua M. Salzman*

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April 21, 2021

**CERTIFICATION OF COMPLIANCE**

I hereby certify that this motion complies with the requirements of Federal Rule of Appellate Procedure 27(d). This motion contains 268 words.

/s/ Joshua M. Salzman  
JOSHUA M. SALZMAN

**CERTIFICATE OF SERVICE**

I hereby certify that on April 21, 2021, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Second Circuit by using the appellate CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

*/s/ Joshua M. Salzman*  
JOSHUA M. SALZMAN