

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

<hr/>)	
AES ELECTRICAL d/b/a FREESTATE)	
ELECTRICAL CONSTRUCTION COMPANY)	
)	Civil Action No. 2017 CA 000369 R(RP)
Plaintiffs)	Judge Elizabeth Wingo
)	
v.)	Next Event:
)	Initial Conference
TRUMP OLD POST OFFICE LLC, <i>et al.</i>)	April 28, 2017
)	
Defendants)	
<hr/>)	

**CONSENT MOTION FOR SECOND EXTENSION OF TIME
TO FILE A RESPONSIVE PLEADING**

Pursuant to D.C. Super. Ct. R. Civ. P. 6 (b), Trump Old Post Office LLC and Fidelity and Deposit Company of Maryland (“Defendants”), by undersigned counsel, move this Court for entry of an Order granting an extension of time. Plaintiffs and Defendants have had substantive settlement discussions and are requesting three weeks to either file a dismissal or file Defendants’ response to Plaintiff’s Complaint. Currently a response is due March 27, 2017 and, due to the settlement discussions, we request to file a motion for dismissal or a responsive pleading on or before April 17, 2017.

/s/ Matthew D. Foster
Matthew D. Foster, DC Bar No. 503057
Pepper Hamilton LLP
600 Fourteenth Street, NW
Washington, DC 20005
Tel No. 202-220-1235
Fax No. 202-220-1665
fosterm@pepperlaw.com

Dated: March 23, 2017

*Counsel for Trump Old Post Office LLC and
Fidelity and Deposit Company of Maryland*

RULE 12-I(A) CERTIFICATION

I certify that pursuant to District of Columbia Superior Court Rule 12-I(a),
Plaintiff's counsel consents to the motion for extension of time.

/s/ Matthew D. Foster
Matthew D. Foster

**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF
CONSENT MOTION FOR EXTENSION OF TIME**

District of Columbia Superior Court Rule of Civil Procedure 6 (b).

CERTIFICATE OF SERVICE

I hereby certify that on March 23, 2017, I will file a copy of the foregoing
Consent Motion For Extension Of Time To File A Responsive Pleading electronically with the
Court's Casefilexpress system, which will send electronic notification to all counsel of record.

/s/ Matthew D. Foster
Matthew D. Foster

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

AES ELECTRICAL d/b/a FREESTATE ELECTRICAL CONSTRUCTION COMPANY)	
)	
Plaintiffs)	Civil Action No. 2017 CA 000369 R(RP)
)	Judge Elizabeth Wingo
)	
v.)	Next Event:
)	Initial Conference
TRUMP OLD POST OFFICE LLC, <i>et al.</i>)	April 28, 2017
)	
Defendants)	
)	

PROPOSED ORDER

This cause came before the Court upon the Consent Motion for Extension of Time to File a Responsive Pleading of Defendants Trump Old Post Office LLC and Fidelity and Deposit Company of Maryland, and upon consideration of the same, it appearing to the Court that there are good grounds for granting the motion;

IT IS HEREBY ORDERED that Trump Old Post Office LLC and Fidelity and Deposit Company of Maryland will either serve response to Plaintiff's Complaint on or before April 17, 2017 or the Plaintiff will file a motion for dismissal.

JUDGE

Notice to:

Matthew D. Foster, DC Bar No. 503057
Pepper Hamilton LLP
600 Fourteenth Street, NW, Suite 500
Washington, DC 20005

Roger C. Jones
Nicole L. Campbell
Huddles Jones Sorteberg & Dachille, P.C.
10211 Wincopin Circle, Suite 200
Columbia, Maryland 21044