

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

<b>UNITED STATES ex rel. DEBORAH W. COOK,</b>	)	
	)	
	)	
<b>Plaintiff,</b>	)	<b>Civil Action File No.:</b>
	)	<b>1:13-cv-04023-SCJ</b>
<b>v.</b>	)	
	)	
<b>ENERGY &amp; PROCESS CORPORATION,</b>	)	
	)	
	)	
<b>Defendant.</b>	)	
	)	

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**JOINT MOTION FOR EXTENSION OF DEADLINES**

Defendant Energy & Process Corporation (“E&P”) and Plaintiff the United States of America (the “United States”) (collectively, the “Parties”), through counsel and pursuant to Federal Rule of Civil Procedure 6(b), jointly move the Court for an extension of deadlines in this matter to allow for time to finalize a tentative settlement agreement between the Parties. Although the Parties have made progress toward settlement since the Court granted the last joint motion for extension of deadlines on January 12, 2017, the settlement agreement is not yet finalized, and the Parties estimate that an additional 30 days will be sufficient to complete their negotiations. The Parties’ suggested briefing schedule for the Court’s consideration is set forth below.

<b>Deadline</b>	<b>Current Date</b>	<b>Proposed Date</b>
Last day for E&P to file a responsive pleading or motion to dismiss and supporting brief in response to the United States' Complaint in Intervention (Dkt. 24)	Feb. 8, 2017	Mar. 10, 2017
Last day for United States to file a response brief in opposition to E&P's motion to dismiss	Mar. 8, 2017	Apr. 7, 2017
Last day for E&P file a reply brief in support of its motion to dismiss	Mar. 29, 2017	Apr. 28, 2017

A proposed order granting the jointly requested relief is attached.

Wherefore, the Parties respectfully and jointly request that the Court grant the relief requested herein.

Respectfully submitted this 8th day of February 2017.

[Signatures appear on the following page.]

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\*Applications for Admission  
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**CERTIFICATE OF COMPLIANCE PURSUANT TO L.R. 7.1D, NDGa**

The undersigned counsel hereby certifies that the foregoing has been prepared using one of the font and point selections approved in LR 5.1, NDGa.

This 8th day of February 2017.

s/Andrew A. Stulce  
Andrew A. Stulce

**CERTIFICATE OF SERVICE**

The undersigned counsel certifies that a true and correct copy of **JOINT MOTION FOR EXTENSION OF DEADLINES** was filed electronically with the Court. Notice of this filing will be sent to all counsel of record via the Court's CM/ECF filing system.

This 8th day of February 2017.

s/ Andrew A. Stulce  
Andrew A. Stulce