

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

BASHE ABDI YOUSUF, <i>et alii</i>,	*
	*
Plaintiffs,	*
	*
versus	* Civil Action No. 1:04cv1360 (LMB/JFA)
	*
MOHAMED ALI SAMANTAR,	*
	*
Defendant.	*

***DEFENDANT MOHAMED ALI SAMANTAR'S
OPPOSITION TO PLAINTIFFS'
MOTION TO COMPEL***

COMES NOW, before this Honorable Court, your in the above-encaptioned matter, *viz.*, Defendant Mohamed Ali Samantar, by and through undersigned counsel, respectfully submits this opposition to Plaintiffs' Motion to Compel Production and for Costs Incurred (Docket Entry # 179). As your Plaintiffs are aware, your Defendant has filed a Motion for a Temporary Protective Order with this Honorable Court ("Motion") (Docket Entry # 182), with a hearing on said motion to be held on Friday, 1 July 2011, coextensive with the hearing scheduling of the subject motion to which your Defendant now responds. The Motion requests, *inter alia*, an extension of time for your Defendant to respond to the very discovery requests that are the subject of Plaintiffs' Motion to Compel. The Brief (Docket Entry # 183) accompanying your Defendant's Motion for Temporary Protective Order fully explains the reasons for your Defendant's need for an extension of time to respond and sets out the basis for the "excusable neglect" warranting Defendant's failure to respond to date. *See*: Fed. R. Civ. P. 6(b)(1)(B). Accordingly, your Defendant's Brief aforesaid is incorporated herein by reference.

WHEREFORE, and for the foregoing reasons, your Defendant respectfully requests that this Honorable Court DENY Plaintiffs' Motion to Compel and that Defendant be afforded such other and further relief as this Honorable Court may deem just and fitting under the existent circumstances.

Respectfully submitted,

Dated: 29 June 2011, at Alexandria, Virginia

/s/ Joseph Peter Drennan
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ATTORNEY AND COUNSELOR,
IN PRAESENTI, FOR
MOHAMED ALI SAMANTAR

CERTIFICATE OF SERVICE

I, Joseph Peter Drennan, undersigned, hereby and herewith certify that on this 29th day of June 2011, I caused to be served a true and correct copy of the foregoing to be served, electronically, by this Honorable Court's CM/ECF System unto counsel of record for your Plaintiffs.

Respectfully submitted,

/s/ Joseph Peter Drennan
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