

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

SUHAIL NAJIM	)	
ABDULLAH AL SHIMARI <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C.A. No. 08-cv-0827 GBL-JFA
	)	
CACI INTERNATIONAL, INC., <i>et. al.</i> ,	)	
	)	
Defendants	)	
	)	

**PLAINTIFFS' MOTION TO ENLARGE TIME TO  
COMPLETE PLAINTIFFS' DEPOSITIONS**

Plaintiffs hereby respectfully move for an order granting Plaintiffs' motion to enlarge the time to complete Plaintiffs' depositions by two weeks to April 5, 2013. Under the Court's March 8, 2013 Order, Plaintiffs are required to make themselves available for depositions in the Eastern District of Virginia by the week of March 18, 2013, and as of this date, only one of the four Plaintiffs has appeared for his deposition. As set forth in accompanying Memorandum and Declaration attached thereto, despite being in possession of valid visas and airline tickets to the enter the United States, and through no fault of Plaintiffs or their counsel, Iraq-based Plaintiffs Al Shimari, Rashid and Al-Zuba'e were not permitted to travel to the United States as scheduled on March 15, 2013. The Department of State has advised that additional time is required to complete the required inter-agency coordination to allow these three Plaintiffs to travel to the United States. For reasons detailed in the Declaration of Baher Azmy, Esq., the Department of

State has further advised that the issuance of an order by this Court as soon as practicable is necessary to expedite the re-approval process for the Iraq-based Plaintiffs' entry to US.

Plaintiffs' counsel conferred with Defendant's counsel regarding the relief sought in this motion and Defendant's counsel informed Plaintiffs' counsel that they cannot take a position on the present motion at this time, without knowing when and whether Plaintiffs will be actually be granted permission again to enter the United States.

Wherefore, Plaintiffs respectfully request that the Court grant Plaintiffs' motion, and extend the period of time by which Plaintiffs are to appear for deposition to April 5, 2013.

Date: March 22, 2013

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 22, 2013, I electronically filed PLAINTIFFS' MOTION TO ENLARGE TIME TO COMPLETE PLAINTIFFS' DEPOSITIONS through the CM/ECF system, which sends notification to counsel for Defendant.

/s/ George Brent Mickum

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