

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

<hr/>)	
UNITED STATES OF AMERICA,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	No. 1:14cv969
)	(LO / TRJ)
ALL ASSETS LISTED IN ATTACHMENT A, <i>etc.</i> ,)	
)	
<i>Defendants in Rem.</i>)	
<hr/>)	

**CLAIMANTS’ CONSENT MOTION
REGARDING SUPPLEMENTAL RESPONSES
TO THE SPECIAL INTERROGATORIES**

PURSUANT TO Rules 16, 26, 37, and Supplemental Rule G of the Federal Rules of Civil Procedure, Claimants make this consent motion to extend the time for their supplemental responses to the Special Interrogatories on the following grounds:

1. The government served Special Interrogatories under Supplemental Rule G(6)(a) on September 24, 2014, to which Claimants served objections and responses on the agreed upon due-date, October 24, 2014.
2. The government moved to compel further answers (Doc. 38), which Claimants opposed (Doc. 44), and which motion was granted in part and denied in part (*Order*, Doc. 56). The *Order* was entered on Friday, December 19, 2014, and the due-date for Claimants to comply with the *Order* is Tuesday, December 23, 2014.
3. Certain information that may be contained in the supplemental answers (*e.g.*, date of birth, passport numbers, and driver license numbers) will constitute confidential “personal identifiers” that must be redacted from the public record under Federal Rule of Civil Procedure

5.2. Similarly, certain other information provided regarding any prior criminal cases in other countries may constitute protected information that should not be disclosed in the public record.

4. Claimants are not seeking Rule 72 review of the *Order*.

5. Claimants are foreign nationals, residing overseas, and each has a foreign legal advisor. Coordinating with Claimants and their foreign legal advisors over the intervening weekend (December 20-21) and the Christmas and New Years holidays has been, and will continue to be difficult. Claimants respectfully request an extension of time to comply to and including December 30, 2014.

6. The government does not oppose this relief.

The parties do not seek a hearing on this motion. A proposed order is submitted herewith.

Dated: December 23, 2014

Respectfully submitted,

/s/ Craig C. Reilly
Craig C. Reilly, Esq. (VSB # 20942)
111 Oronoco Street
Alexandria, Virginia 22314
TEL (703) 549-5354
FAX (703) 549-2604
craig.reilly@ccreillylaw.com
Counsel for Claimants

<p><i>Of Counsel for Claimants Kim Dotcom and Megaupload Limited:</i></p>	<p><i>Local Counsel for Claimants Julius Bencko and Sven Echternach:</i></p>
<p>Ira P. Rothken (<i>pro hac vice</i>) Jared R. Smith (<i>pro hac vice</i>) ROTHKEN LAW FIRM 3 Hamilton Landing Suite 280 Novato, CA 94949 TEL (415) 924-4250 FAX (415) 924-2905 ira@techfirm.net jared@techfirm.net</p>	<p>David B. Smith SMITH & ZIMMERMAN, PLLC 108 North Alfred Street Alexandria, Virginia 22314 TEL (703) 548-8911 FAX (703) 548-8935 dsmith@smithzimmerman.com</p>
<p>William A. Burck (<i>pro hac vice</i>) Derek L. Shaffer (<i>pro hac vice</i>) Stephen M. Hauss (<i>pro hac vice</i>) QUINN EMANUEL URQUHART & SULLIVAN LLP 777 6th Street NW, Suite 1100 Washington, D.C. 20001 TEL (202) 538-8000 FAX (202) 538-8100 williamburck@quinnemanuel.com derekshaffer@quinnemanuel.com stephenhauss@quinnemanuel.com</p>	

CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2014, the foregoing was filed and served electronically by the Court's CM/ECF system upon all registered users:

Dana J. Boente
UNITED STATES ATTORNEY
Karen Ledbetter Taylor
ASSISTANT UNITED STATES ATTORNEY
United States Attorney's Office
Justin W. Williams U.S. Attorney's Building
2100 Jamieson Avenue
Alexandria, Virginia 22304
Karen.Taylor2@usdoj.gov
Attorneys for the United States

/s/ Craig C. Reilly
Craig C. Reilly, Esq. (VSB # 20942)
111 Oronoco Street
Alexandria, Virginia 22314
TEL (703) 549-5354
FAX (703) 549-5355 (NEW)
craig.reilly@ccreillylaw.com
Counsel for Claimants