

**In the United States Court of Federal Claims**

MICHAEL J. FORBES, *pro se.*

*Plaintiff,*

v.

THE UNITED STATES

*Defendant.*

No. 1:2024-cv-01953

MOTION FOR EXTENSION  
OF TIME  
(Judge Hadji)

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE  
TO DEFENDANT'S MOTION FOR JUDGMENT ON THE ADMINISTRATION RECORD  
AND THE PLAINTIFF'S CROSS-MOTION FOR JUDGMENT ON THE  
ADMINISTRATIVE RECORD**

1. Plaintiff, Michael J. Forbes, *pro se*, respectfully requests time (14 days) to file, a response to the Defendant's Motion for Judgment on the Administrative Record (MJAR) and, to file a Cross-Motion for Judgment on the Administrative Record (CMJAR) pursuant to Court's Scheduling Order (ECF-18) and Appendix K of the Rules of the U.S. Court of Federal Claims ("RCFC").

**UNOPPOSED MOTION FOR AN EXTENTION OF TIME**

2. The Plaintiff does not agree that the Administrative Record is correct, nor complete (ECF-20). In fact, the Plaintiff recently found that the Administrative Record is even more deficient than originally observed, upon its filing; it is severely deficient on many significant and materially pertinent issues that were, not only, pursuant to Rule 26(a)(1), but also, repeatedly brought forth by the Plaintiff to the Defendant since the cause of action. In accordance RCFC Appendix K, III, 6(b), the Plaintiff wishes to offer to the Court the *de novo* evidence, for the Administrative Record as the Plaintiff believes it is materially deficient and, as filed, demonstrates competitive prejudice; this requested extension of time is dedicated to that result by bringing forth real and substantial issues to complete the Administrative and/or Court Records as the Court adjudicates this justiciable dispute. Then, and only then, will this justiciable dispute be ripe for a fair adjudication.
3. The Plaintiff wishes to offer and augment the Administrative Record with items that are directly *apropos* to the Defendant's Duty to Disclose, and other directly relevant evidence that the Plaintiff has organized, filed and maintained as this controversy grew, some of which would be overly burdensome for the Agency to gather even though it possesses it.

4. The Plaintiff asks for 14 additional days to complete the Scheduled Motions currently due on May 7, 2025 as he works to file simultaneous Motions, to Complete and, to Supplement, the Record pursuant to Appendix K, III, 6(b).
5. The Plaintiff conferred with the Defendant and it does not oppose this request. Therefore, pending Court approval, the amended schedule would tentatively be as follows:

PLT Response to DEF MJAR and CMJAR due May 21, 2025.

DEF Reply ISO DEF MJAR and Response to PLT CMJAR due May 28, 2025.

PLT Reply ISO CMJAR due June 4, 2025.

Apr 29, 2025

Date

614 Northampton Road  
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[Signature]

Signature of Plaintiff

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