

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

APPLICATION OF FOURTEEN PRESS ORGANIZATIONS FOR ACCESS TO SEALED SEARCH WARRANT RECORDS	Case No. 1:26-mc-00144 (JEB)
IN RE APPLICATION OF THE NEW YORK TIMES COMPANY IN THE MATTER OF REP. ILHAN OMAR INVESTIGATION	Case No. 1:26-mc-00145 (JEB)
IN THE MATTER OF THE SEARCH OF ILHAN OMAR’S WASHINGTON, D.C. RESIDENCE	Case No. 1:26-mc-00147 (JEB)

**THE UNITED STATES OF AMERICA’S MOTION FOR AN EXTENSION OF TIME
TO RESPOND TO PENDING REQUESTS TO
ACCESS SEALED SEARCH WARRANT RECORDS**

Before the Court are three Applications to unseal *ex parte* materials and proceedings related to a federal search warrant for the personal residence in the District of Columbia of Congresswoman Ilhan Nur Said Elmi, a/k/a Ilhan Abdullahi Omar (the “Subject”). *See* Case Nos. 1:26-mc-00144 (14 press organizations), 1:26-mc-00145 (New York Times Company), 1:26-mc-00147 (Judicial Watch, Inc.).

Under the Federal Rules, and for good cause shown, the United States respectfully moves to establish a single deadline to respond to all three applications, with such deadline to be established after execution of the search warrant is complete. *See* Fed. R. Crim. P. 45(b) (“[w]hen an act must or may be done within a specified period, the court on its own may extend the time, or for good cause may do so on a party’s motion made before the originally prescribed ... time expires”); Fed. R. Civ. P. 6(b)(1) (“[w]hen an act may or must be done within a specified time, the

court may, for good cause, extend the time ... with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires”). Each Application was filed and assigned to the Court on October 15, 2026, but notice was not received of the filings until October 16, 2026. On October 15, the Court set an October 22 deadline for the United States’ response to the 14 press organizations’ and New York Times’ motions, and, on October 19, 2026, set a November 9 deadline to respond to Judicial Watch’s motion. The United States’ time to respond to the applications has not expired.

For the reasons explained in the accompanying Memorandum of Law, which the United States is seeking leave to submit under seal and *ex parte*, good cause exists to extend these deadlines until after the subject search warrant has been fully executed. The Court should direct the United States to submit, within thirty days of when the warrant’s execution is complete, a status report so alerting the Court and the applicant. The Court should further direct the parties to confer within seven days of the filing of the foregoing status report about appropriate next steps and then jointly to file, by the seventh day following the United States’ status report, a status report offering their respective proposals for next steps. Should the Court not postpone the response deadline until after the search warrant’s execution is complete, the Court should set November 9, 2026 (already the response deadline in 1:26-mc-00147) as the deadline to respond to all the Applications. Because each application advances a materially identical request, the United States presently intends to file a consolidated response to all three motions.

In accordance with LCvR 7(m), counsel for the United States reached out to the Applicants’ counsel to discuss this motion in a good-faith effort to determine whether there is any opposition to the relief sought and, if there is, to narrow the areas of disagreement. The Applicants oppose this motion and the relief sought herein.

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JEANINE FERRIS PIRRO
United States Attorney

s/ Peter Pfaffenroth
PETER PFAFFENROTH
Chief, Civil Division
D.C. Bar No. 496637
United States Attorney's Office
601 D Street, N.W.
Washington, D.C. 20530
Telephone: 202-252-2513
Email: peter.pfaffenroth@usdoj.gov

s/Alessandra P. Serano
ALESSANDRA P. SERANO
Associate Deputy Attorney General
U.S. Department of Justice
Email: Alessandra.serano2@usdoj.gov

s/ G. A. Massucco-LaTaif
G. A. MASSUCCO-LATAIF
Chief, Criminal Division
PA Bar Number 70718
United States Attorney's Office
601 D Street, N.W.
Washington, D.C. 20530
Telephone: 202-252-7066
Email: George.Massucco@usdoj.gov