

**BEFORE THE
U.S. DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, DC**

Carl Isenburg)	
)	
)	
v.)	Docket DOT-OST-2020-0159
)	
Air Tahiti Nui and WestJet)	
)	

**UNCONTESTED MOTION OF AIR TAHITI NUI
FOR EXTENSION OF TIME TO FILE AN ANSWER**

Communications with respect to this document should be addressed to:

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Counsel for Air Tahiti Nui

August 28, 2020

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Pursuant to 14 C.F.R. § 302.405(a), Air Tahiti Nui respectfully requests an extension of time until Friday, October 9, 2020, to answer the complaint filed by Carl Isenburg (complainant) in the above-captioned docket. In response to counsel’s request, the complainant has advised that he does not object to the time extension sought by Air Tahiti Nui.

Air Tahiti Nui submits that good cause exists for the Department to grant this uncontested motion for a short extension of time for filing of its Answer. The extension of time will permit Air Tahiti Nui to fully investigate and respond to the allegations brought by the complainant. In addition, the motion is in the public interest, as the time extension will allow Air Tahiti Nui to address all of the issues outlined in the complaint, thereby assisting the Department in its review of the matter at issue. Furthermore, the requested extension will not unduly delay this proceeding. Finally, there is ample precedent for the Department’s granting of the requested time extension, including the Department’s grant of an extension of time until October 9, 2020 to file an Answer for WestJet, who is also named in the above-captioned complaint.¹

¹ DOT Grant of Extension, Docket DOT-OST-2020-0159 (August 27, 2020).

WHEREFORE, Air Tahiti Nui respectfully requests that the Department extend to October 9, 2020, its deadline for answering the above-captioned complaint.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Evelyn D. Sahr', positioned above a horizontal line.

Evelyn D. Sahr
Drew M. Derco
ECKERT SEAMANS CHERIN
& MELLOTT, LLC

Counsel for Air Tahiti Nui

CERTIFICATE OF SERVICE

I hereby certify that I have on this date electronically served a copy of the foregoing Motion
on the following persons:

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Vinh Nguyen
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August 28, 2020

Eric Felland

Eric A. Felland