

BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

_____)	
Gary Odell)	
)	
v.)	Docket DOT-OST-2020-0168
)	
WestJet)	
_____)	

**UNCONTESTED MOTION OF WESTJET
FOR AN EXTENSION OF TIME TO FILE AN ANSWER**

Communications with respect to this document should be addressed to:

Robert E. Cohn
Patrick R. Rizzi
HOGAN LOVELLS US LLP
555 Thirteenth Street, NW
Washington, DC 20004
+1 202 637 4999/5659
robert.cohn@hoganlovells.com
patrick.rizzi@hoganlovells.com

Counsel for WESTJET

August 28, 2020

BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

Gary Odell)	
)	
v.)	Docket DOT-OST-2020-0168
)	
WestJet)	August 28, 2020
)	

**UNCONTESTED MOTION OF WESTJET
FOR AN EXTENSION OF TIME TO FILE AN ANSWER**

Pursuant to 14 C.F.R. § 302.405(a), WestJet respectfully requests an extension of time until October 16, 2020, for WestJet to answer the complaint filed by Gary O'Dell ("Complainant"), dated August 28, 2020, in the above-referenced docket. By email dated August 28, 2020, Complainant agreed to the requested extension.

Good cause exists for the Department to grant this motion for an extension of time. The Complaint has a number of allegations and several attachments. The requested extension of time for WestJet's Answer will allow WestJet to fully investigate and respond to the Complainant's allegations and address fully the issues set forth in the lengthy Complaint. This, in turn, will assist the Department in its review of the Complaint and related issues. In addition, the requested extension will not unduly delay this proceeding.

Lastly, the requested extension is consistent with Department precedent, including recent extensions granted to other carriers facing similar types of

Complaints, even in cases (unlike here) where the complainant did not consent to the extension.¹

WHEREFORE, WestJet respectfully requests that the Department extend its deadline for answering the above-referenced Complaint to October 16, 2020.

Respectfully submitted,



Robert E. Cohn
Patrick R. Rizzi
HOGAN LOVELLS US LLP
555 Thirteenth Street, NW
Washington, DC 20004

Counsel for WestJet

¹ See *Cervinka v. Air Canada* (Docket DOT-OST-2020-0055), May 27, 2020 (complainant objected to extension); *Chain v. Air Canada* (Docket DOT-OST-2020-0075), June 20, 2020 (complainant objected to extension); *Leung v. Air Canada* (Docket DOT-OST-2020-0079), June 22, 2020 (complainant objected to extension); *Imtiaz v. WestJet Airlines Ltd.* (Docket DOT-OST-2020-0101), July 14, 2020 (complainant objected to extension); *Doane v. WestJet* (Docket DOT-OST-2020-0137), August 17, 2020 (complainant objected to the requested extension); see also *Woo v. Air Canada* (Docket DOT-OST-2020-0073), June 19, 2020 (complainant did not object); *Miller v. Air Canada* (Docket DOT-OST-2020-0071), June 19, 2020 (complainant did not object); *Cyr v. Sunwing Airlines* (Docket DOT-OST-2020-0057), June 15, 2020 (complainant consented to extension); *Gutnicki v. United Airlines* (Docket DOT-OST-2020-0048), June 4, 2020.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Uncontested Motion of WestJet for an Extension of Time to File an Answer has been served this August 28, 2020, upon each of the following addressees:

gtodell87@gmail.com
kimberly.graber@dot.gov
blane.workie@dot.gov
vinh.nguyen@dot.gov
cristina.draguta@dot.gov



Jessica E. Bartlett