

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

_____)	
FATMA MAROUF, <i>et al.</i> ,)	
)	
Plaintiffs)	
)	Civil Action No. 1:18-cv-00378 APM
v.)	
)	
ALEX AZAR, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO AMENDED
COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule 7(m), Defendant United States Conference of Catholic Bishops (“USCCB”) respectfully requests that the deadline for answering or otherwise responding to the Amended Complaint in this matter be extended by thirty-two days from April 5, 2018 up to, and including, May 7, 2018. This is the first request for an extension of this deadline.

Plaintiffs filed the action on February 20, 2018 against Alex Azar in his official capacity as Secretary of the United States Department of Health and Human Services, the United States Department of Health and Human Services, Steven Wagner in his official capacity as Acting Assistant Secretary for the Administration for Children and Families, the Administration for Children and Families, Scott Lloyd in his official capacity as Director of the Office of Refugee Resettlement, the Office of Refugee Settlement, and the United States Conference of Catholic Bishops.

Plaintiffs served the summons and their complaint on USCCB on March 14, 2018. *See* Dkt. #20. Then Plaintiffs filed an Amended complaint on March 22, 2018. *See* Dkt. # 21.

Pursuant to Federal Rule of Civil Procedure 15(a)(3), the deadline for USCCB to respond to the Amended complaint is April 5, 2018. The deadline for the government defendants to respond is May 7, 2018. *See* Dkt. #12 (“Answer due for ALL FEDERAL DEFENDANTS by 5/5/2018”); Fed. R. Civ. P. 6(a)(1)(C) (extending time until “next day that is not a Saturday, Sunday, or legal holiday”).

Counsel for USCCB has conferred with counsel for the Plaintiffs and counsel for the government defendants. All parties agree that USCCB’s deadline to respond to the complaint should be extended to coincide with the government defendants’ deadline.

Principles of judicial economy provide good cause for such an extension. Among other efficiencies, coordination of deadlines will further the orderly progression of these proceedings and conserve judicial resources. The factual and legal issues at issue are related, and a single deadline will allow this Court to avoid piecemeal consideration of any responsive papers.

A Proposed Order granting the relief sought is attached.

[Signatures on Following Page]

Dated: March 26, 2018

Respectfully submitted,

/s/ David T. Raimer.

David T. Raimer (DC ID #994558)
Anthony J. Dick (DC ID #1015585)
JONES DAY
51 Louisiana Ave. NW
Washington, DC, 20001-2113
Tel.: 202-879-3939
Fax: 202-626-1700
dtraimer@jonesday.com
ajdick@jonesday.com

*Leon F. DeJulius, Jr. (PA ID #90383)
*John D. Goetz (PA ID #47759)
JONES DAY
500 Grant Street, Suite 4500
Pittsburgh, PA 15219-2514
Tel.: 412-391-3939
Fax: 412-394-7959
lfdejulius@jonesday.com
jdgoetz@jonesday.com

*Attorneys for Defendant United States
Conference of Catholic Bishops*

**admission pro hac vice to be sought*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

_____)	
FATMA MAROUF, <i>et al.</i> ,)	
)	
Plaintiffs)	
)	Civil Action No. 1:18-cv-00378 APM
v.)	
)	
ALEX AZAR, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

[PROPOSED] ORDER

Upon consideration of the Defendant United States Conference of Catholic Bishops (“USCCB”)’s Unopposed Motion for Extension of Time to Respond to Complaint, and for good cause shown, the Motion is hereby GRANTED.

Defendant USCCB shall have up to and including May 7, 2018 to respond to Plaintiffs’ Complaint.

IT IS SO ORDERED.

Dated: _____

THE HONORABLE AMIT P. MEHTA
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Unopposed Motion for Extension of Time to Respond to Complaint was served to the Plaintiffs' counsel using the Court's CM/ECF system and to the government defendants by first-class mail, postage prepaid, as listed below on the 26th day of March, 2018:

Jessica L. Ellsworth, Esq.
Kenneth Y. Choe, Esq.
Jennifer A. Fleury, Esq.
James A. Huang, Esq.
HOGAN LOVELLS US LLP
555 Thirteenth Street, N.W.
Washington, D.C. 20004-1109

Alali Dagogo-Jack
HOGAN LOVELLS US LLP
4085 Campbell Avenue, Suite 100
Menlo Park, CA 94025

Camilla B. Taylor
Jamie A. Gilksberg
LAMBDA LEGAL DEFENSE AND
EDUCATION FUND, INC.
105 West Adams, 26th Floor
Chicago, IL 60603-6208

Kenneth D. Upton, Jr.
LAMBDA LEGAL DEFENSE AND
EDUCATION FUND, INC.
3500 Oak Lawn Avenue, Suite 500
Dallas, TX 75219-6722

Attorneys for Plaintiffs

OFFICE OF REFUGEE
RESETTLEMENT,
330 C Street, S.W.,
Washington, D.C. 20201

ALEX AZAR, in his official capacity as
Secretary of the UNITED STATES
DEPARTMENT OF HEALTH AND
HUMAN SERVICES,
200 Independence Avenue, S.W.,
Washington, D.C. 20201

UNITED STATES DEPARTMENT OF
HEALTH AND HUMAN SERVICES,
200 Independence Avenue, S.W.
Washington, D.C. 20201

STEVEN WAGNER, in his official
capacity as Acting Assistant Secretary for
the ADMINISTRATION FOR
CHILDREN AND FAMILIES,
330 C Street, S.W.,
Washington, D.C. 20201

ADMINISTRATION FOR CHILDREN
AND FAMILIES,
330 C Street, S.W.,
Washington, D.C. 20201

SCOTT LLOYD, in his official capacity as
Director of the OFFICE OF REFUGEE
RESETTLEMENT,
330 C Street, S.W.,
Washington, D.C. 20201

/s/ David T. Raimer

David T. Raimer (DC ID #994558)
Anthony J. Dick (DC ID #1015585)
JONES DAY
51 Louisiana Ave. NW
Washington, DC 20001-2113
Tel.: 202-879-3939
Fax: 202-626-1700
dtraimer@jonesday.com
ajdick@jonesday.com

*Leon F. DeJulius, Jr. (PA ID #90383)
*John D. Goetz (PA ID #47759)
JONES DAY
500 Grant Street, Suite 4500
Pittsburgh, PA 15219-2514
Tel.: 412-391-3939
Fax: 412-394-7959
lfdejulius@jonesday.com
jdgoetz@jonesday.com

*Attorneys for Defendant United States
Conference of Catholic Bishops*

**admission pro hac vice to be sought*