

dismiss. Defendants request a two-week extension of the deadline for replying to Plaintiffs' consolidated response to Defendants' motions to dismiss.

In support of this joint request for extensions of time, the parties state the following:

1. On May 21, 2018, Federal Defendants filed a 21-page motion to dismiss raising jurisdictional challenges to Plaintiffs' Amended Complaint. *See* ECF No. 28. On that same date, USCCB separately filed a 14-page motion to dismiss also raising jurisdictional challenges to Plaintiffs' Amended Complaint. *See* ECF No. 29.

2. The current deadline for Plaintiffs' consolidated response to Defendants' motions to dismiss is June 4, 2018. A two-week extension would make the deadline June 18, 2018.

3. Plaintiffs consented to, and Federal Defendants received, a two-week extension in responding to Plaintiffs' Amended Complaint. Plaintiffs also consented to, and USCCB received, a multi-week extension in responding to Plaintiffs' Amended Complaint, to the same deadline as Federal Defendants' deadline.

4. Plaintiffs intend to file a consolidated response to the two motions to dismiss, and an extension would ensure that Plaintiffs' consolidated response is a streamlined response to the issues presented in both motions to dismiss.

5. If Plaintiffs' requested extension were granted, the ordinary deadline for Defendants' replies to Plaintiffs' consolidated response to Defendants' motions to dismiss would be June 25, 2018. A two-week extension would make the deadline July 9, 2018.

6. Counsel for Defendants request the extension to accommodate Plaintiffs' requested extension as well as pre-planned travel and court deadlines in unrelated matters.

7. No oral argument is set in this matter, and the requested extensions would not result in substantial delay or prejudice to any party.

8. This is Plaintiffs' first request for an extension to respond to the motions to dismiss, and Plaintiffs do not anticipate any further request for an extension of this deadline.

9. This is Defendants' first request for an extension to reply to the consolidated response to the motions to dismiss, and Defendants do not anticipate any further request for an extension of this deadline.

For the foregoing reasons, the parties request that the Court find good cause for the requested extensions exists, extend Plaintiffs' response deadline to June 18, 2018, and extend Defendants' reply deadline to July 9, 2018.

Dated: May 31, 2018

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing with the Clerk of the Court through the ECF system on May 31, 2018. This system provided a copy to and effected service of this document on all parties.

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