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10 *Counsel for Defendants*

11
 12 UNITED STATES DISTRICT COURT
 13 FOR THE CENTRAL DISTRICT OF CALIFORNIA
 14 WESTERN DIVISION
 15

16 ANDREW MASON DVASH-
 17 BANKS and ETHAN JACOB
 18 DVASH-BANKS
 19 Plaintiff,
 20
 v.
 21 THE UNITED STATES
 22 DEPARTMENT OF STATE, and
 23 THE HONORABLE REX W.
 24 TILLERSON, Secretary of State,
 25 Defendants.

No. CV 18-523-JFW-JC
 JOINT STIPULATION TO EXTEND
 CASE DEADLINES
 Honorable John F. Walter
 Current Deadline to
 Respond to
 Complaint: March 27, 2018
 Proposed Deadline
 to Respond to
 Complaint: May 29, 2018

1 Defendants the United States Department of State and the Honorable Rex
2 W. Tillerson, Secretary of State (“Defendants” or “the Government”) and Plaintiffs
3 Andrew Mason Dvash-Banks and Ethan Jacob Dvash-Banks (“Plaintiffs”)
4 (collectively, “the Parties”), stipulate and request the Court extend the case
5 deadlines in this case for 60 calendar days.

6 In support of this joint request, the parties state the following:

7 (1) This is the Parties’ first motion to extend any deadlines in this case.

8 (2) The Parties are in discussions about amicably resolving this lawsuit in
9 the absence of litigation.

10 (3) The Parties believe that at this juncture their resources could best be
11 devoted to continued efforts toward resolving this case voluntarily rather than
12 active litigation. A 60-day extension of the deadlines in this case will permit the
13 Parties to focus on those efforts that could render unnecessary the burdens and
14 expenses associated with litigation.

15 (4) The Parties propose filing a joint status report no later than May 29,
16 2018 to apprise the Court of the status of the Parties’ discussions and efforts to
17 resolve this lawsuit.

18 (5) The Parties submit that this extension request is not for the purpose of
19 undue delay, and agree that the continuance will not prejudice the conduct of the
20 litigation.

21 (6) The only deadline currently scheduled in this case is the deadline for
22 Defendants’ response to the Complaint, which currently is due on March 27, 2018.
23 Pursuant to the extension sought herein, the deadline for Defendants’ response to
24 the Complaint would be extended to May 29, 2018.

25 Good cause, therefore, exists for the Parties’ joint request. Accordingly, the
26 Parties request the Court extend the case deadlines in this case and set no further
27 deadlines until the parties have submitted their joint status report.

28

1 Dated: March 22, 2018

Respectfully submitted,

2 Attorneys for Plaintiffs

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26 -and-

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CERTIFICATE OF SERVICE

Case No. CV 18-523-JFW-JC

I hereby certify that I am over the age of 18 and not a party to the above-titled action. I am employed as a Trial Attorney at the United States Department of Justice, Civil Division, Federal Programs Branch. My business address is 20 Massachusetts Ave., N.W., Washington, DC 20530.

On March 22, 2018, I served this JOINT STIPULATION REQUESTING STAY OF CASE DEADLINES, on each person or entity named below by uploading an electronic version of this document to the Court's ECF system:

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I declare under penalty of perjury under the laws of the United States of America that the following is true and correct.

Executed on March 22, 2018, at Washington, DC.

By: s/Vinita B. Andrapalliyal
VINITA B. ANDRAPALLIYAL
Trial Attorney
United States Department of Justice
Civil Division

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No. CV 18-523-JFW-JC

[Proposed] Order Extending Case
 Deadlines

Honorable John F. Walter
 United States District Judge

1 The Court has received and considered the parties' stipulation to extend the
2 case deadlines. The parties have demonstrated good cause for their request.

3 It is hereby ordered that:

4 The case deadlines are extended by 60 days. Defendants' response to
5 Plaintiffs' Complaint is extended from March 27, 2018 to May 29, 2018.

6 The parties will file a joint status report by May 29, 2018.
7

8 Dated _____, 2018

9 HONORABLE JOHN F. WALTER
10 UNITED STATES DISTRICT JUDGE

11 Presented by:

12 Attorneys for Plaintiffs

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