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10 *Counsel for Defendants*

11
 12 UNITED STATES DISTRICT COURT
 13 FOR THE CENTRAL DISTRICT OF CALIFORNIA
 14 WESTERN DIVISION
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16 ANDREW MASON DVASH-
 17 BANKS and ETHAN JACOB
 18 DVASH-BANKS
 19 Plaintiffs,
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 v.
 21 THE UNITED STATES
 22 DEPARTMENT OF STATE, and
 23 THE HONORABLE MICHAEL R.
 24 POMPEO, Secretary of State,
 25 Defendants.
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No. CV 18-523-JFW-JC
 JOINT STIPULATION TO EXTEND
 CASE DEADLINES
 Honorable John F. Walter
 Current Deadline to
 Respond to
 Complaint: May 29, 2018
 Proposed Deadline
 to Respond to
 Complaint: July 16, 2018

1 Defendants the United States Department of State and the Honorable
2 Michael R. Pompeo, Secretary of State¹ (“Defendants” or “the Government”) and
3 Plaintiffs Andrew Mason Dvash-Banks and Ethan Jacob Dvash-Banks
4 (“Plaintiffs”) (collectively, “the Parties”), stipulate and request the Court extend
5 the deadlines in this case for 45 calendar days.

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

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

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

10 (3) Specifically, Defendants have advised Plaintiffs that they are engaged
11 in internal discussions regarding approaches which could resolve the issues in
12 dispute for resolution by this Court, without making any concessions as to the
13 merits of Plaintiffs’ claims.

14 (4) The Parties believe that, at this juncture, their resources could best be
15 devoted to continued efforts toward resolving this case voluntarily rather than to
16 active litigation. A 45-day extension of the deadlines in this case will permit the
17 Parties to focus on those efforts that could render unnecessary the burdens and
18 expenses associated with litigation.

19 (5) The Parties propose filing a joint status report no later than July 16,
20 2018, to apprise the Court of the status of the Parties’ discussions and efforts to
21 resolve this lawsuit.

22 (6) The Parties submit that this extension request is not for the purpose of
23 undue delay, and agree that the continuance will not prejudice the conduct of the
24 litigation.

25 (7) The only pending deadline currently scheduled in this case is the
26 deadline for Defendants’ response to the Complaint, which currently is due on May
27

28 ¹ In accordance with Federal Rule of Civil Procedure 25(d), Michael R. Pompeo is substituted
for his predecessor as Secretary of State.

1 29, 2018. Pursuant to the extension sought herein, the deadline for Defendants'
2 response to the Complaint would be extended to July 16, 2018.

3 Good cause, therefore, exists for the Parties' joint request. Accordingly, the
4 Parties request the Court extend the case deadlines in this case and set no further
5 deadlines until the parties have submitted their joint status report.

6
7 Dated: May 23, 2018

Respectfully submitted,

8 Attorneys for Plaintiffs

9
10 By: s/ Alexa Lawson-Remer

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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 May 23, 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 May 23, 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 45 days. Defendants' response to
5 Plaintiffs' Complaint is extended from May 29, 2018 to July 16, 2018.

6 The parties will file a joint status report by July 16, 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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