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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: July 16, 2018
 Proposed Deadline
 to Respond to
 Complaint: August 6, 2018

1 Defendants the United States Department of State and the Honorable
2 Michael R. Pompeo, Secretary of State (“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 21 calendar days.

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

7 (1) This is the Parties’ third 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 continue to
11 consider approaches which could resolve the issues in dispute for resolution by this
12 Court, without making any concessions as to the merits of Plaintiffs’ claims.

13 (4) The Parties believe that, at this juncture, their resources could best be
14 devoted to continued efforts toward resolving this case voluntarily rather than to
15 active litigation. A 21-day extension of the deadlines in this case will permit the
16 Parties to focus on those efforts that could render unnecessary the burdens and
17 expenses associated with litigation.

18 (5) The Parties propose filing a joint status report no later than August 6,
19 2018, to apprise the Court of the status of the Parties’ discussions and efforts to
20 resolve this lawsuit.

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

24 (7) The only pending deadline currently scheduled in this case is the
25 deadline for Defendants’ response to the Complaint, which currently is due on July
26 16, 2018. Pursuant to the extension sought herein, the deadline for Defendants’
27 response to the Complaint would be extended to August 6, 2018.

28

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

4
5 Dated: July 11, 2018

Respectfully submitted,

6 Attorneys for Plaintiffs

7
8 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 July 11, 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 July 11, 2018, at Washington, DC.

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 Secretary of State,

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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 21 days. Defendants' response to
5 Plaintiffs' Complaint is extended from July 16, 2018 to August 6, 2018.

6 The parties will file a joint status report by August 6, 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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