

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

ALLISON DAWN BLIXT and LUCAS	:	
ALEXANDER ZACCARI-BLIXT	:	
	:	
Plaintiffs,	:	
v.	:	
	:	Civ. No. 1:18-cv-00124-EGS
The UNITED STATES DEPARTMENT	:	
OF STATE and MICHAEL R. POMPEO	:	
in his official capacity as Secretary, U.S.	:	
Department of State	:	
	:	
Defendants.	:	

**JOINT MOTION FOR AN EXTENSION OF TIME TO RESPOND TO THE  
COMPLAINT AND MOTION FOR A BRIEFING SCHEDULE**

Defendants the United States Department of State and the Honorable Michael R. Pompeo, Secretary of State (“Defendants” or “the Government”) and Plaintiffs Allison Dawn Blixt and Lucas Alexander Zaccari-Blixt (“Plaintiffs”) (collectively, “the Parties”), stipulate and jointly request that the Court extend the deadline in this case to respond to Plaintiffs’ complaint and enter the briefing schedule proposed below.

In support of this request, the Parties state the following:

- (1) This is the Parties’ fourth motion to extend any deadlines in the case.
- (2) Currently, Defendants’ deadline to respond to Plaintiffs’ complaint is August 6, 2018.
- (3) Although the Parties had been discussing ways to amicably resolve this case, Defendants now believe that the litigation should proceed.
- (4) Defendants intend to file a dispositive motion in response to Plaintiffs’ complaint.

The Parties have conferred, and have reached agreement on the following briefing schedule:

Defendants' motion to dismiss: August 29, 2018

Plaintiffs' response: October 12, 2018

Defendants' reply: October 26, 2018

(5) The Parties submit that this extension and request for a briefing schedule is not requested for the purpose of undue delay, and further submit that the schedule will not prejudice the conduct of the litigation.

Good cause, therefore, exists for the Parties' joint request. Accordingly, the Parties request that the Court extend Defendants' time to respond to Plaintiffs' complaint and set the above briefing schedule.

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Dated: August 1, 2018

Respectfully submitted,

*Attorneys for Plaintiffs*

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Department of State	:	
	:	
Defendants.	:	

**[PROPOSED] ORDER**

Upon consideration of the Parties’ joint motion to extend the deadline to respond to Plaintiffs’ complaint and to enter a briefing schedule for Defendants’ anticipated motion to dismiss, it is HEREBY ORDERED that the Parties’ motion is GRANTED. It is hereby ORDERED that the following briefing deadlines are set in this case:

Defendants’ motion to dismiss:	August 29, 2018
Plaintiffs’ response:	October 12, 2018
Defendants’ reply:	October 26, 2018

\_\_\_\_\_  
Date

\_\_\_\_\_  
Emmett G. Sullivan  
United States District Judge

Internally