

**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.	:	

**MOTION FOR AN EXTENSION OF TIME TO FILE SUPPLEMENTAL BRIEFING**

Defendants the United States Department of State and the Honorable Michael R. Pompeo, Secretary of State (“Defendants” or “the Government”) request that the Court extend Defendants’ deadline in this case to provide supplemental briefing regarding Defendants’ motion to dismiss.

In support of this request, Defendants state the following:

- (1) This is Defendants’ first non-joint motion to extend any deadlines in the case.
- (2) Currently, the parties have been directed to file supplemental briefing by March 15, 2019. Minute Order of Feb. 25, 2019.
- (3) The Department of State is evaluating its position on the issues in this case in light of the Central District of California’s February 21, 2019, opinion on summary judgment in *Dvash-Banks v. Pompeo, et al.*, 18-cv-523 (C.D. Cal.), and its entry of judgment on March 6, 2019.
- (4) Defendants asked Plaintiffs for their position on this motion. Plaintiffs oppose the motion.

(5) Defendants submit that this extension 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 Defendants' request. Accordingly, Defendants request that the Court extend Defendants' time to file supplemental briefing.

Dated: March 12, 2019

Respectfully submitted,

JOSEPH H. HUNT  
Assistant Attorney General

ANTHONY J. COPPOLINO  
Assistant Director

By: *s/ Vinita B. Andrapalliyal*  
VINITA B. ANDRAPALLIYAL  
LISA MARCUS  
Trial Attorneys  
United States Department of Justice  
Civil Division  
Federal Programs Branch  
P.O. Box 868, Ben Franklin Station  
Washington, DC 20044  
Tel: (202) 305-0845  
Fax: (202) 616-8470  
Email: [Vinita.b.andrapalliyal@usdoj.gov](mailto:Vinita.b.andrapalliyal@usdoj.gov)

**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.	:	
	:	

**[PROPOSED] ORDER**

Upon consideration of Defendants’ motion to extend the deadline to file supplemental briefing in connection with Defendants’ motion to dismiss, it is HEREBY ORDERED that motion is GRANTED.

\_\_\_\_\_  
Date

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