

**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 REX W. TILLERSON in	:	
his official capacity as Secretary, U.S.	:	
Department of State	:	
	:	
Defendants.	:	

JOINT MOTION TO EXTEND CASE DEADLINES

Defendants the United States Department of State and the Honorable Rex W. Tillerson, Secretary of State (“Defendants” or “the Government”) and Plaintiffs Allison Dawn Blixt and Lucas Alexander Zaccari-Blixt (“Plaintiffs”) (collectively, “the Parties”), request the Court to extend the case deadlines in this case for 60 calendar days. In support of this joint request, the parties state the following:

- (1) This is the Parties’ first motion to extend any deadlines in this case.
- (2) The Parties are in discussions about amicably resolving this lawsuit in the absence of litigation.
- (3) The Parties believe that at this juncture their resources could best be devoted to continued efforts toward resolving this case voluntarily rather than active litigation. A 60-day extension of the deadlines in this case will permit the Parties to focus on those efforts that could render unnecessary the burdens and expenses associated with litigation.
- (4) The Parties propose filing a joint status report no later than May 29, 2018 to apprise the Court of the status of the Parties’ discussions and efforts to resolve this lawsuit.

(5) The Parties submit that this extension request is not for the purpose of undue delay and agree that the continuance will not prejudice either party.

(6) The only deadline currently scheduled in this case is the deadline for Defendants' response to the Complaint, which currently is due on March 26, 2018. Pursuant to the extension sought herein, the deadline for Defendants' response to the Complaint would be extended to May 29, 2018.

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

Dated: March 21, 2018

Respectfully submitted,

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[PROPOSED] ORDER

Upon consideration of the Parties’ joint motion to stay the case deadlines, it is HEREBY ORDERED that Parties’ motion is GRANTED and this the case deadlines in this case are EXTENDED for 60 calendar days. Defendant’s deadline to respond to Plaintiffs’ Complaint is EXTENDED until May 29, 2018. The Parties will further provide a joint status report to the Court by May 29, 2018.

Date

Emmett G. Sullivan
United States District Judge