

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

ALLISON DAWN 1b		hgbn 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 TO EXTEND CASE DEADLINES**

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 request the Court extend the deadlines in this case for 21 calendar days.

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

- (1) This is the Parties’ third motion to extend any deadlines in this case.
- (2) The Parties continue to engage in discussions about amicably resolving this lawsuit in the absence of litigation.
- (3) Specifically, Defendants have advised Plaintiffs that Defendants continue to consider approaches which could resolve the instant litigation, without making any concessions as to the merits of Plaintiffs’ claims.
- (4) The Parties believe that, at this juncture, their resources could best be devoted to continued efforts toward resolving this case voluntarily rather than to active litigation. A 21-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.

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

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

(7) The only pending deadline currently scheduled in this case is the deadline for Defendants' response to the Complaint, which currently is due on July 16, 2018. Pursuant to the extension sought herein, the deadline for Defendants' response to the Complaint would be extended to August 6, 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: July 11, 2018

Respectfully submitted,

*Attorneys for Plaintiffs*

By: s/ Elizabeth A. Cassady

ELIZABETH A. CASSADY

(*cassadye@sullcrom.com*)

D.C. Bar No. 997160

1700 New York Ave. NW, Suite 700

Washington, DC 20006-5215

Telephone: (202) 956-7500

THEODORE EDELMAN

(*edelmant@sullcrom.com*)

JESSICA KLEIN

(*kleinj@sullcrom.com*)

ANDREW K. JENNINGS

(*jenningsa@sullcrom.com*)

125 Broad Street  
New York, New York 10004-2498  
Telephone (212) 558-4000  
Facsimile: (212) 558-3588

-and-

IMMIGRATION EQUALITY

By: /s/ Aaron C. Morris

AARON C. MORRIS  
([amorris@immigrationequality.org](mailto:amorris@immigrationequality.org))  
40 Exchange Place  
Suite 1300  
New York, New York, 10005-2744  
Telephone: (212) 714-2904

*Attorneys for Defendants*

CHAD A. READLER  
Acting Assistant Attorney General

NICOLA T. HANNA  
United States Attorney

JOSHUA E. GARDNER  
Assistant Director

By: s/ Vinita B. Andrapalliyal

VINITA B. ANDRAPALLIYAL  
Trial Attorney  
United States Department of Justice  
Civil Division  
Office of Immigration Litigation  
District Court Section  
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. :  
 :  
 The UNITED STATES DEPARTMENT :  
 OF STATE and MICHAEL R. POMPEO :  
 in his official capacity as Secretary, U.S. :  
 Department of State :  
 :  
 \_\_\_\_\_ Defendants. :

Civ. No. 1:18-cv-00124-EGS

**[PROPOSED] ORDER**

Upon consideration of the Parties’ joint motion to stay the case deadlines, it is HEREBY ORDERED that Parties’ motion is GRANTED and the case deadlines in this case are EXTENDED for 21 calendar days. Defendants’ deadline to respond to Plaintiffs’ Complaint is EXTENDED until August 6, 2018. The Parties will further provide a joint status report to the Court by August 6, 2018.

\_\_\_\_\_  
Date

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