

SULLIVAN & CROMWELL LLP

TELEPHONE: 1-212-558-4000
FACSIMILE: 1-212-558-3588
WWW.SULLCROM.COM

125 Broad Street
New York, New York 10004-2498

LOS ANGELES • PALO ALTO • WASHINGTON, D.C.

BRUSSELS • FRANKFURT • LONDON • PARIS

BEIJING • HONG KONG • TOKYO

MELBOURNE • SYDNEY

October 02, 2019

Via ECF and Hand Delivery

The Honorable Emmet G. Sullivan,
The U.S. District Court for the District of Columbia,
333 Constitution Avenue N.W.,
Washington, D.C. 20001.

The Honorable Robin M. Meriweather,
The U.S. District Court for the District of Columbia,
333 Constitution Avenue N.W.,
Washington, D.C. 20001.

Re: *Blixt v. U.S. Dep't of State*, No. 1:18-cv-00124

Dear Judge Sullivan and Judge Meriweather:

I write on behalf of Plaintiffs, Allison Blixt and her minor son L.Z.-B., to inform the Court that Ms. Blixt was offered and has accepted an employment opportunity in the United States. We understand that Ms. Blixt intends to relocate to the United States in the near future in order to begin employment in her new position, and that the Zaccari-Blixt family intends to join Ms. Blixt in the United States at a yet to be determined date in the future.

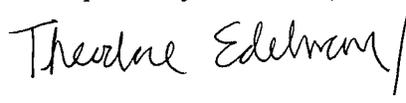
We further understand that to facilitate their relocation, Ms. Blixt and her spouse, Stefania, have applied for permanent residency in the United States for L.Z.-B. Although Plaintiffs continue to assert that L.Z.-B. has been a U.S. citizen since birth, the only way in which the Zaccari-Blixt family may relocate to the United States in a reasonably timely manner is for Ms. Blixt to file for permanent residency for her son as though she were his step mother. The Zaccari-Blixt family has taken this step out of necessity and without prejudice to their contention that L.Z.-B. has been a U.S. citizen since his birth as the child of Allison and Stefania Zaccari-Blixt and their claims in the above-referenced action ("Action"). We understand that, inasmuch as any potential grant of permanent residency is at the discretion of the U.S. government, the Zaccari-Blixt family's relocation plans are subject to and dependent upon the grant of permanent residency for L.Z.-B.

The Honorable Emmet G. Sullivan
The Honorable Robin M. Meriweather

-2-

Plaintiffs respectfully suggest that it may further the conservation of judicial and party resources for the parties to address this development and any implications on the Action with the Court in a conference at the Court's convenience.

Respectfully submitted,


Theodore Edelman

cc: All counsel of record (via ECF)