

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

DANA ALIX ZZYYM,

Plaintiff,

v.

ANTONY J. BLINKEN, *in his official  
capacity as Secretary of State*, and  
RACHEL B. CRAWFORD, *in her official  
capacity as Director of the Colorado Passport  
Agency of the U.S. Department of State*,

Defendants.

Civil Action No. 15-2362-RBJ

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO RECONSIDER PLAINTIFF'S PASSPORT APPLICATION**

The Department of State respectfully requests an extension of time to reconsider Plaintiff Dana Alix Zzyym's passport application. The parties have previously requested five extensions: the first to allow the Department more time to review Plaintiff's supplementary materials to their passport application, ECF No. 116, the second to allow settlement discussions to begin, ECF No. 118, the third to continue settlement discussions, ECF No. 120, the fourth to continue settlement discussions in light of the Department's announcement that it has begun moving towards adding a gender marker for non-binary, intersex, and gender non-conforming persons applying for a passport, ECF No. 122, and the fifth to continue settlement discussions in light of the Department's coordination with other relevant federal agencies about that policy, ECF No. 124. The Court granted those extension requests. ECF Nos. 117, 119, 121, 123, 125.

The parties now submit this sixth request to continue settlement discussions. As previously referenced, the Department announced on June 30, 2021, that it "has begun moving towards adding a gender marker for non-binary, intersex, and gender non-conforming persons applying for a

passport” and is “evaluating the best approach to achieve this goal.” ECF No. 122. The Department also explained that it was in the process of coordinating with other relevant federal agencies about adding such a gender marker. That process is now complete. The parties have continued settlement discussions in earnest and expect to conclude negotiations shortly. However, some additional time is needed.

Accordingly, the Department requests that the reconsideration deadline be extended from September 22, 2021, to October 13, 2021. Plaintiff agrees to this request.

Dated: September 22, 2021

Respectfully submitted,

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