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UNITED STATES DEPARTMENT OF HOMELAND SECURITY

7
8 IN THE UNITED STATES DISTRICT COURT FOR THE
9 EASTERN DISTRICT OF CALIFORNIA

10
11 JASDEV SINGH,

12 Plaintiff,

13 v.

14 UNITED STATES DEPARTMENT
OF HOMELAND SECURITY AND
15 DOES 1-50,

16 Defendants.

1:12-cv-498-AWI-SKO-PS

**DEFENDANT'S EX PARTE
APPLICATION FOR INITIAL 65-DAY
EXTENSION OF TIME TO RESPOND
TO COMPLAINT; ORDER**

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18 The U.S. Department of Homeland Security, defendant, applies under Local Rule
19 144(c) for an initial 65-day extension of the time under Fed. R. Civ. P. 12(a)(2) for
20 defendant's response to the complaint. The reason is that defense counsel needs more time to
21 confer with the various concerned offices including the parts of Homeland Security's Office
22 of Principal Legal Advisor that deal with Federal Tort Claims Act and the Privacy Act, two
23 regional law offices in the Bureau of Prisons, this office's Criminal Division, and the DOJ
24 Civil Division's Federal Programs Branch and Office of Immigration Litigation, to formulate
25 defendant's position, to write a responsive motion, and to obtain internal review of the motion
26 before filing. Scheduling constraints are explained in the accompanying counsel declaration.
27 No previous extension of this time has been requested or granted. A suggested form of order
28 is included in the event this application is granted.

1 Dated: September 11, 2012

BENJAMIN B. WAGNER
United States Attorney

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3 By: /s/ YHimel
4 YOSHINORI H. T. HIMEL
Assistant U.S. Attorney

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6 **ORDER**

7 Upon defendant's ex parte application, good cause having been shown, defendant's
8 time to respond to the complaint is extended until **November 21, 2012**.

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12 IT IS SO ORDERED.

13 Dated: September 11, 2012 /s/ Sheila K. Oberto
14 UNITED STATES MAGISTRATE JUDGE