

1 GOLDBERG & ASSOCIATES
2 JULIE A. GOLDBERG, ESQ.,
3 California Bar No. 235565
4 5586 Broadway, Third Floor
5 Bronx, NY 10463
6 Tel: (718) 432-1022
7 Email: ecf@goldbergimmigration.com

8 *Attorney for Plaintiffs*

9
10 IN THE UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA
12

13 A.M.Q.A., ET AL.,

14 Plaintiffs,

15 v.

16 MONICA B. LUGO, ET AL.,

17 Defendants.

CASE NO. 1:20-CV-01556-JLT-EPG

STIPULATION AND ~~PROPOSED~~ ORDER FOR
EXTENSION OF TIME

18
19 The Plaintiffs respectfully request an extension of time in which to respond to the Defendant's
20 Motion to Dismiss, and counsel for Defendants do not oppose.

21 Defendants filed their Motion for Dismissal Points and Authorities on May 5, 2023. (ECF 84.)
22 Plaintiffs' response is currently due on May 19, 2023. Counsel for Plaintiffs, Ms. Goldberg, has been
23 experiencing continuous health issues and is undergoing surgery. Thus, Plaintiffs need a short additional
24 extension to finish preparing their response to Defendant's Motion to Dismiss.

25 ///

26 ///

27 ///

28 ///

///

1 The parties stipulate that the new date for Plaintiffs to file a response is June 5, 2023. The
2 parties further request that all other filing deadlines be similarly extended.

3
4 Respectfully submitted,

5
6
7
8 DATED: May 18, 2023

9 **GOLDBERG & ASSOCIATES**
10 Attorneys for Plaintiffs

11 By: s/ Julie A Goldberg
12 Julie A Goldberg, esq.

13 DATED: May 18, 2023

14
15 By: s/ Elliot C. Wong (With Permission)
16 ELLIOT C. WONG
17 Assistant United States Attorney

18 ~~[PROPOSED]~~ ORDER

19 The above stipulation is approved.

20
21 IT IS SO ORDERED.

22 Dated: May 19, 2023

23 
24 _____
25 UNITED STATES DISTRICT JUDGE
26
27
28