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 UNITED STATES CITIZENSHIP
 7 AND IMMIGRATION SERVICES

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

11
 12 MARIO RENE SALGUERO PAIZ,
 13 Plaintiff,
 14 v.
 15 UNITED STATES CITIZENSHIP AND
 IMMIGRATION SERVICES,
 16 Defendant.

Case No. 2:18-CV-01779-JAM-EFB

**SECOND STIPULATION AND ORDER FOR
 CONTINUING DEFENDANT’S INITIAL
 RESPONSE TO COMPLAINT**

Prior Deadline: September 7, 2018

New Deadline: September 21, 2018

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1 **SECOND STIPULATION AND ORDER**

2 IT IS HEREBY STIPULATED, by and between the parties and subject to Court approval, that
3 Defendant United States Citizenship and Immigration Services (“USCIS”) may have up to and including
4 September 21, 2018, to respond to the Complaint.

5 The reasons for this Stipulation are as follows:

6 1. Plaintiff Mario Rene Salguero Paiz filed this action on June 20, 2018, against USCIS
7 pursuant to the Freedom of Information Act, 5 U.S.C. § 552(a)(4)(B). ECF No. 1. Plaintiff served
8 USCIS with the Summons and Complaint on June 27, 2018. ECF No. 8. The United States Attorney’s
9 Office received the Summons and Complaint on July 11, 2018.

10 2. Pursuant to Eastern District Local Rule 144(a), the parties previously stipulated to
11 continue USCIS’s deadline to respond to the Complaint to September 7, 2018.

12 3. The parties are engaged in settlement discussions and require two additional weeks to
13 explore the possibility to settlement. The parties accordingly agree that USCIS may have up to and
14 including September 21, 2018, to respond to the Complaint.

15 Dated: September 6, 2018

McGREGOR W. SCOTT
United States Attorney

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17 By: /s/ Joseph B. Frueh
JOSEPH B. FRUEH
Assistant United States Attorney
Attorneys for Defendant

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19 HaleyNelson & Heilbrun, LLP

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21 By: /s/ Sarah Kate Heilbrun (authorized on 9/6/2018)
SARAH KATE HEILBRUN
Attorneys for Plaintiff

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24 **IT IS SO ORDERED**

25 Dated: 9/6/18

/s/ John A. Mendez
HON. JOHN A. MENDEZ
United States District Court Judge