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1 STUART F. DELERY Assistant Attorney General 2 Civil Division, U.S. Department of Justice ELIZABETH J. STEVENS VSBN 47445 3 Assistant Director, District Court Section Office of Immigration Litigation 4 ARAM A. GAVOOR CTBN 426-472 5 Trial Attorney, District Court Section Office of Immigration Litigation 6 U.S. Department of Justice 7 PO Box 868, Ben Franklin Station Washington DC 20044 8 Phone: (202) 305-8014 Fax: (202) 616-8962 9 E-mail: Aram.Gavoor@usdoj.gov 10 Attorneys for Defendants UNITED STATES DISTRICT COURT 11 NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION 12 13 MUNIR IQTISH, 14 Plaintiff, Case No. 3:12-cv-04523-SI 15 16 v. 17 CAROL KELLER, FIELD OFFICE JOINT MOTION TO EXTEND DIRECTOR, SAN JOSE DISTRICT 18 **BRIEFING SCHEDULE** OFFICE, UNITED STATES 19 CITIZENSHIP AND IMMIGRATION SERVICES; ET AL., 20 21 Defendants. 22 The parties in the above-titled action hereby submit this Joint Motion to Extend the 23 24 briefing schedule related to Plaintiff's Motion for Summary Judgment, which was filed on 25 October 17, 2013, by 14 days. ECF No. 31. The Government's response, which would be in the 26 form of an opposition and cross-motion for summary judgment, is currently due on October 31. 27 28 Joint Motion to Extend Briefing Schedule Case No. 3:12-cv-4523-SI

2013. If the Court grants this motion, the Government's response would be due on November 1 2 14, 2013. 3 Good cause exists to grant this motion. The Parties are discussing the possibility of 4 settlement, which would obviate the need for further litigation in this case. The Parties anticipate 5 that they can conclude their discussions of settlement by November 14, 2013. Counsel for 6 7 Plaintiff, Mr. James Canfield, has telephonically indicated to undersigned counsel his assent to 8 join in this motion. 9 Respectfully submitted, Dated: October 29, 2013 10 STUART F. DELERY <u>/s/ James Robert Canfield</u> 11 JAMES ROBERT CANFIELD Assistant Attorney General Canfield Law Offices Civil Division 12 55 E. Empire Street 13 San Jose, CA 95112 DAVID J. KLINE Phone (408) 993-8472 **Director, District Court Section** 14 Fax: (408) 947-7716 Office of Immigration Litigation E-mail: maheshbajoria@hotmail.com 15 **ELIZABETH J. STEVENS** 16 Attorney for Plaintiff Assistant Director, District Court Section Office of Immigration Litigation 17 18 By: /s/ Aram A. Gavoor ARAM A. GAVOOR 19 Trial Attorney, District Court Section Office of Immigration Litigation 20 Civil Division 21 U.S. Department of Justice P.O. Box 868, Ben Franklin Station 22 Washington, D.C. 20044 Phone: (202) 305-8014 23 Fax: (202) 616-8962 24 Email: Aram.Gavoor@usdoj.gov 25 Attorneys for Defendants 26 27 28

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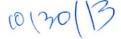
[PROPOSED] ORDER

The above Joint Motion to Extend Briefing Schedule is GRANTED.

Defendants' response to Plaintiff's Motion for Summary Judgment (ECF No. 31) is now due on November 14, 2013.

IT IS SO ORDERED.

Dated:



UNITED STATES DISTRICT JUDGE

Joint Motion to Extend Briefing Schedule Case No. 3:12-cv-4523-SI

CERTIFICATE OF SERVICE

Case No. 3:12-cv-04523-SI

I hereby certify that on October 29, 2013, true and correct copies of the foregoing

document were served pursuant to the district court's ECF electronic filing system to the

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following parties:

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/s/ Aram A. Gavoor

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