

1 CHAD A. READLER
 Acting Assistant Attorney General
 2 Civil Division
 3 WILLIAM C. PEACHEY
 Director, Office of Immigration Litigation
 4 District Court Section
 5 JEFFREY S. ROBINS
 Assistant Director
 6 HANS H. CHEN
 Senior Litigation Counsel
 7 U.S. Department of Justice, Civil Division
 8 Office of Immigration Litigation, District Court Section
 9 P.O. Box 868, Washington, DC 20044
 10 Tel: (202) 307-4469; Fax: (202) 305-7000
 hans.h.chen@usdoj.gov
 11 ATTORNEYS FOR DEFENDANTS

12 **UNITED STATES DISTRICT COURT**
 13 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

15	GLORIA PLASCENCIA-DE HARO,)	No. C 3:17-cv-02079-LB
16	Plaintiff,)	
17)	STIPULATION TO CONTINUE
18	v.)	CASE MANAGEMENT
19	JOHN F. KELLY, et al.,)	CONFERENCE AND TO EXTEND
20	Defendants.)	TIME TO RESPOND TO
21)	COMPLAINT

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 23 Pursuant to Local Rules 6-2 and 7-12, Plaintiff Gloria Plascencia-De Haro
 24 (“Plaintiff”) and Defendants John F. Kelly, et al. (“Defendants” and collectively
 25 with Plaintiff, the “Parties”) stipulate as follows:

26 This is an immigration case arising under the Administrative Procedure Act,
 27 5 U.S.C. § 701, in which Plaintiff challenges the denial by United States
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UNITED STATES DEPARTMENT OF JUSTICE, CIVIL DIVISION
 OFFICE OF IMMIGRATION LITIGATION

P.O. BOX 868
 WASHINGTON, DC 20044
 202-307-4469

1 Citizenship and Immigration Services of Plaintiff's application for adjustment of
2 status to permanent residence.

3 Defendants' deadline to answer or otherwise respond to the Complaint in
4 this action is currently June 23, 2017.

5 On April 14, 2017, the Court entered an Order Setting Initial Case
6 Management Conference and ADR Deadlines ("Order"), ECF No. 4. The Order
7 scheduled an initial case management conference ("CMC") for July 13, 2017.

8 The Parties have agreed to pursue additional administrative remedies that
9 may obviate the need for further litigation. The Parties are this day filing a Notice
10 of Need for ADR Phone Conference in which they are requesting an Early
11 Settlement Conference with a Magistrate Judge. At that Early Settlement
12 Conference, the parties intend to discuss the potential administrative remedies
13 further with the Magistrate Judge.

14 To permit the Parties to do so without burdening them or the Court with
15 additional filings or conferences, the Parties respectfully request and stipulate to an
16 order continuing the CMC until July 20, 2017. For the same reason, the Parties
17 respectfully request and stipulate to an order extending the Parties' time to answer
18 or respond to the Complaint by twenty-one days, from June 23, 2017, until and
19 including July 21, 2017.

20 Undersigned counsel for Defendants attests he obtained the concurrence in
21 the filing of the document from the other electronic signatory to this stipulation.

22 This is the first request for modification of time in this action.
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1 Dated: June 22, 2017

Respectfully submitted,

2 LAW OFFICE OF
3 ROBERT L. LEWIS

CHAD A. READLER
Acting Assistant Attorney General
Civil Division

4 /s/ Kevin Michael Crabtree
5 KEVIN MICHAEL CRABTREE
6 428 13th Street 7th Floor
7 Oakland, California 94612
8 (510) 834-1288
9 (510) 834-0431 (facsimile)
crabtree@immigrantdefense.com

WILLIAM C. PEACHEY
Director, Office of Immigration Litigation
District Court Section

JEFFREY S. ROBINS
Assistant Director

10 /s/ Hans H. Chen
11 HANS H. CHEN
12 Senior Litigation Counsel
13 U.S. Department of Justice, Civil Division
14 Office of Immigration Litigation
15 District Court Section
16 P.O. Box 868, Washington, DC 20044
17 Telephone: (202) 307-4469
18 Facsimile: (202) 305-7000
hans.h.chen@usdoj.gov

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19 PURSUANT TO STIPULATION, IT IS SO ORDERED.

20 Dated: 06/23/2017

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22 HON. LAUREL BEELER
23 United States Magistrate Judge

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