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7 Attorneys for Defendants

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

11 HAMED HAFEZY,
 12 Plaintiff,
 13 v.
 14 MERRICK B. GARLAND, in his official
 15 capacity as Attorney General, United States
 16 Department of Justice, *et al.*,
 17 Defendants.

Case No. 3:24-cv-04584 LJC

**STIPULATION TO EXTEND TIME FOR
 DEFENDANTS' RESPONSE TO
 PLAINTIFF'S COMPLAINT; AND ORDER**

18 The parties, through their undersigned attorneys, hereby stipulate to an extension of time for
 19 Defendants' response to Plaintiff's complaint. Defendants will file their response on or before
 20 October 16, 2024.

21 The parties further request a corresponding extension on the deadline for filing a motion for
 22 summary judgment under the Court's Immigration Mandamus Procedural Order. Dkt. No. 7. Currently,
 23 Defendants must file a motion for summary judgment by 120 days after the complaint was served, or
 24 November 28, 2024. In view of the agreed-upon extension for Defendants' response to the complaint,
 25 the parties request that Defendants must file their motion for summary judgment by December 16, 2024.
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1 Dated: September 24, 2024

Respectfully submitted,¹

2 ISMAIL J. RAMSEY
3 United States Attorney

4 /s/ Elizabeth D. Kurlan
5 ELIZABETH D. KURLAN
6 Assistant United States Attorney
7 Attorneys for Defendants

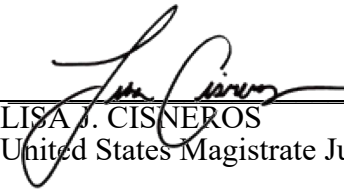
8 Dated: September 24, 2024

9 /s/ Zachary Nightingale
10 ZACHARY NIGHTINGALE
11 Van Der Hout LLP
12 Attorney for Plaintiff

13 **ORDER**

14 Pursuant to stipulation, IT IS SO ORDERED.

15 Date: September 25, 2024

16 
17 LISA J. CISNEROS
18 United States Magistrate Judge

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27 ¹ In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all
28 signatories listed herein concur in the filing of this document.

1 **DECLARATION OF ELIZABETH D. KURLAN**

2 I, Elizabeth D. Kurlan, declare and state as follows:

3 1. I am an Assistant United States Attorney in the United States Attorney’s Office for the
4 Northern District of California and counsel of record for the federal Defendants in the above-captioned
5 action.

6 2. On July 29, 2024, Plaintiff filed a complaint in which he seeks adjudication of his
7 parents’ applications for immigrant visas. *See* Dkt. No. 1. Our office was served with the complaint on
8 July 31, 2024.

9 3. On September 9, 2024, my office contacted Plaintiff’s counsel regarding Defendants’
10 request for an extension of time to prepare their response to the complaint, and Plaintiff consented to the
11 request.

12 I declare under penalty of perjury under the laws of the United States of America that the
13 foregoing is true and correct.

14
15 DATED: September 9, 2024

16 /s/ Elizabeth D. Kurlan
17 ELIZABETH D. KURLAN
Assistant United States Attorney