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7 Attorneys for Defendants

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 OAKLAND DIVISION

12 DUYEN TRAN THAO PHAM,
 13 Plaintiff,

4:22-cv-02914 DMR

14 v.

**STIPULATION TO EXTEND TIME WITHIN
 WHICH DEFENDANTS MUST FILE A
 RESPONSE AND ORDER**

15 UNITED STATES DEPARTMENT OF
 STATE, *et al.*,
 16 Defendants.
 17

18
 19 Plaintiff, by and through his attorney of record, and Defendants, by and through their attorneys
 20 of record, hereby stipulate to a 30-day extension of time within which the Defendants must serve the
 21 answer or otherwise respond in the above-entitled action. Defendants will file their response on or
 22 before August 31, 2022.

23 The parties further request a corresponding extension on the deadline for filing a summary
 24 judgment motion under the Court's Immigration Mandamus Procedural Order. Currently, if Plaintiff
 25 has not filed a motion for summary judgment by 90 days after the Complaint was filed, or August 15,
 26 2022, Defendants must file a motion for summary judgment by 120 days after the Complaint was
 27 served, or September 28, 2022. In light of the agreed-upon extension for Defendants' response to the
 28 Complaint, the parties request that, if Plaintiff has not filed a motion for summary judgment by

Stip to Extend Time
 4:22-cv-02914 DMR

1 September 30, 2022, Defendants must file their motion for summary judgment by October 31, 2022. In
2 accordance with Civil Local Rule 5(i)(3), the filer of this document attests that all signatories listed
3 herein concur in the filing of this document.

4 Dated: July 29, 2022

Respectfully submitted,

5 STEPHANIE M. HINDS
6 United States Attorney

7 /s/ Elizabeth D. Kurlan
8 ELIZABETH D. KURLAN
9 Assistant United States Attorney
10 Attorneys for Defendants

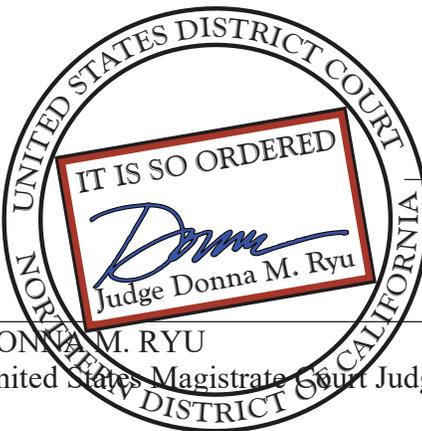
11 Dated: July 29, 2022

12 /s/ Christina Sullivan
13 CHRISTINA SULLIVAN
14 Attorney for Plaintiff

15 **ORDER**

16 Pursuant to stipulation, IT IS SO ORDERED. Defendants' response to the Complaint is due by
17 August 31, 2022, and Defendants must file its motion for summary judgment by October 31, 2022.

18 Date: August 1, 2022

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21
22 DONNA M. RYU
23 United States Magistrate Court Judge