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8 UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA
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|----|--------------------------|---|------------------------------|
| 10 | BORIS ANGUELOV AVRAMSKI, |) | |
| | |) | Case No. 2:12-cv-02167 |
| 11 | Plaintiff, |) | |
| | |) | UNOPPOSED MOTION FOR 30 DAY |
| 12 | v. |) | EXTENSION OF TIME TO ANSWER, |
| | |) | PLEAD, OR OTHERWISE RESPOND |
| 13 | UNITED STATES, et al., |) | TO PLAINTIFF'S COMPLAINT FOR |
| | |) | WRIT OF MANDAMUS AND |
| 14 | Respondents. |) | DECLARATORY RELIEF |
| | |) | |

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16 The United States of America by and through Daniel G.
 17 Bogden, United States Attorney for the District of Nevada, and
 18 Carlos A. Gonzalez, Assistant United States Attorney, without
 19 waiving any defenses that may be available in this case, for the
 20 reasons set forth below, the Defendants move this Court for an
 21 unopposed 30-day extension of time, from March 11, 2013, to and
 22 including April 10, 2013, by which to answer, plead, or otherwise
 23 respond to Boris Anguelov Avramski's ("Plaintiff") Petition for
 24 Writ of Mandamus and Declaratory Relief ("Complaint").

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1 Plaintiff has petitioned the Court, *inter alia*, for a writ
2 of mandamus compelling the Defendants to grant his naturalization
3 application. Defendants have been diligently preparing to
4 answer, plead, or otherwise respond to Plaintiff's Complaint by
5 March 11, 2013. In preparation to answer, plead, or otherwise
6 respond, Defendants have been coordinating with agency counsel,
7 gathering documents, and determining their defenses.
8 Simultaneously, the parties to this action are exploring avenues
9 to resolve this litigation.

10 As the parties seek to resolve the dispute giving rise to
11 this litigation, counsel for Defendants requests an additional 30
12 days to answer, plead, or otherwise respond to Plaintiff's
13 Complaint. Should the parties not be able to resolve this
14 matter, Defendants expect to be in position to answer, plead, or
15 otherwise respond to the Plaintiff's Complaint by April 10, 2013.

16 Counsel for the Defendants has conferred with counsel for
17 Plaintiff, Peter L. Ashman, who has no opposition to this request
18 for an extension of time.

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2 Accordingly, Defendants request an extension of time, from
3 March 11, 2013, to and including April 10, 2013, by which to
4 answer, plead, or otherwise respond to Plaintiff's Complaint.

5 Dated: March 11, 2013

Respectfully submitted,

6 DANIEL G. BOGDEN
7 United States Attorney

8 //s// Carlos A. Gonzalez
9 Assistant United States Attorney

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11 OF COUNSEL:

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14 Civil Division
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Counsel for Defendants

IT IS SO ORDERED.

DATED: March 12, 2013.


UNITED STATES MAGISTRATE JUDGE