

1 DANIEL G. BOGDEN
 United States Attorney
 2 KRYSTAL J. ROSSE
 Assistant United States Attorney
 3 BENJAMIN C. MIZER
 Principal Deputy Assistant Attorney General
 4 WILLIAM C. PEACHEY
 Director
 5 ELIZABETH J. STEVENS
 Assistant Director
 6 TROY D. LIGGETT
 Trial Attorney
 7 FL Bar No. 0086788
 District Court Section
 8 Office of Immigration Litigation
 Civil Division
 9 U.S. Department of Justice
 P.O. Box 868, Ben Franklin Station
 10 Washington, DC 20044
 (202) 532-4765; (202) 305-7000 (fax)
 11 troy.liggett@usdoj.gov

12 Attorneys for Defendants

13
 14 **UNITED STATES DISTRICT COURT**
 15 **DISTRICT OF NEVADA**

16	ERLING OLMERO LOPEZ POLANCO,)	
)	Case No. 2:15-cv-01234-JCM-VCF
17	Plaintiff,)	
)	
18	v.)	
)	
19	LORETTA E. LYNCH, et al.,)	
)	
20	Defendants.)	

21
22 **DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME**

23 (First Request)

24 Defendants, by and through their attorneys, request a thirty day extension of time to file an
25 appropriate pleading to Plaintiff's complaint. In support of this motion, Defendants state as follows:
26

1 1. On June 30, 2015, Plaintiff filed the above-caption Complaint, (ECF No. 1), seeking review
2 under the Administrative Procedure Act of U.S. Citizenship and Immigration Services' ("USCIS") denial
3 of Plaintiff's Petition for U Nonimmigrant Status.

4 2. Defendants have worked diligently to gather information to respond to the Complaint. On
5 August 28, 2015, undersigned counsel received a copy of the 673-page certified administrative record of
6 the adjudication of Plaintiff's Petition, and has been working with agency counsel to prepare an
7 appropriate response to the Complaint.

8 3. Defendants request the extension because, although they have worked diligently to gather
9 information to respond to Plaintiff's allegations, Defendants need additional time to provide a complete
10 and thorough response.

11 4. This request is made in good faith and not for purposes of delay, and will not prejudice
12 Plaintiff.

13 5. This is Defendants' first request for an extension of time to file an appropriate pleading in
14 response to the Complaint.

15 6. On August 28, 2015, undersigned counsel contacted Seth L. Reszko, counsel for Plaintiff,
16 about this motion, and was informed that Plaintiff does not oppose this thirty day extension of time.

17 Defendants therefore respectfully request the Court to grant a thirty day extension of time to file an
18 appropriate pleading to respond to Plaintiff's Complaint, up to and including Wednesday, September 30,
19 2015.

20
21 /

22
23 /

24
25 /

1 Respectfully submitted this 31st day of August 2015.

2 DANIEL G. BOGDEN
United States Attorney

3 KRYSTAL J. ROSSE
4 Assistant United States Attorney

5 BENJAMIN A. MIZER
Principal Deputy Assistant Attorney General

6 WILLIAM C. PEACHEY
7 Director

8 ELIZABETH J. STEVENS
9 Assistant Director

/s/ Troy D. Liggett

TROY D. LIGGETT
Trial Attorney
FL Bar No. 0086788
District Court Section
Office of Immigration Litigation
Civil Division
U.S. Department of Justice
P.O. Box 868, Ben Franklin Station
Washington, DC 20044
(202) 532-4765; (202) 305-7000 (fax)
troy.liggett@usdoj.gov

Attorneys for Defendants

10
11 IT IS SO ORDERED:

12
13
14 

15 ~~UNITED STATES DISTRICT JUDGE~~
UNITED STATES MAGISTRATE JUDGE

16 DATE: August 31, 2015

1 **PROOF OF SERVICE**

2 I, Troy D. Liggett, certify that the following person was served with a copy of **DEFENDANTS'**
3 **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date, and via the method of service,
4 stated below:

5 **CM/ECF Notice**

6 Seth L. Rezko
7 3365 Pepper Lane
8 Suite 102
9 Las Vegas, NV 89120
10 702-727-7777
11 atharilaw@earthlink.net

12 Attorney for Plaintiff

13 Dated this 31st day of August 2015.

14 */s/ Troy D. Liggett*
15 _____
16 TROY D. LIGGETT
17 Trial Attorney
18 District Court Section
19 Office of Immigration Litigation
20 U.S. Department of Justice
21
22
23
24
25
26