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

16 MATTHEW OBIM OKEKE, )  
 )  
 17 Petitioner, ) Case No. 2:15-cv-02178-APG-PAL  
 )  
 18 v. )  
 )  
 19 JEH JOHNSON, Secretary of U.S. )  
 Department of Homeland Security, *et al.*, )  
 20 )  
 Respondents. )

22 **JOINT STIPULATION FOR EXTENSION OF DEADLINE TO ANSWER PETITION**  
 23 **(Second Request)**

24 Pursuant to LR 6-1, 6-2, and 7-1, the parties jointly stipulate to extend the deadline for  
 25 Respondents to answer or otherwise respond to the Petition filed in this matter. In support, the  
 26 parties state as follows:

1           1.       On November 16, 2015, Petitioner filed a petition for writ of mandamus. *See*  
2 Pet., ECF No. 1. Specifically, Petitioner seeks an order from the Court “to compel  
3 Respondents to act on Petitioner’s completed I-485 Application to Adjust Status.” *Id.* at ¶ 1.

4           2.       Although Plaintiff completed service on Respondents on February 1, 2016, the  
5 civil docket entry notation originally indicated that Respondents’ answer deadlines were  
6 February 1 and 2, 2016. *See* Dkt. entry at ECF No. 8. The parties therefore stipulated and  
7 agreed that good cause existed to correct Respondents’ answer deadline from the deadlines  
8 noted on ECF No. 8 to the correct answer date of April 1, 2016. *See* ECF No. 9; Fed. R. Civ.  
9 P. 12(a)(2). The Court approved the parties’ first stipulation and Respondents’ current answer  
10 deadline is April 1, 2016. *See* ECF No. 11.

11           3.       On January 8, 2016, the United States Citizenship and Immigration Services  
12 (“USCIS”) issued Petitioner a Request for Evidence pertaining to his I-485 Application to  
13 Adjust Status, requesting that certain materials be submitted to USCIS by April 4, 2016. Upon  
14 its receipt of the requested materials, USCIS may require additional time beyond Respondents’  
15 April 1 answer deadline to review those materials and adjudicate Petitioner’s I-485 application.  
16 Good cause therefore exists to allow USCIS additional time to review and process Petitioner’s  
17 I-485 application, which could potentially resolve the issues in the Petition without further  
18 litigation.

19           4.       Accordingly, the parties stipulate and agree that good cause exists to extend  
20 Respondents’ answer deadline by thirty days from April 1, 2016, to May 2, 2016.

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1           WHEREFORE, the parties stipulate and agree that good cause exists to extend  
2 Respondents' answer deadline by thirty days from April 1, 2016, to May 2, 2016.

3           Respectfully submitted this 25th day of March 2016.

4   AGWARA & ASSOCIATES 5 6 <u>/s/ Liborius Agwara</u> LIBORIUS AGWARA 4693 E. Flamingo Road 7 Las Vegas, Nevada 89121 (702) 385-4800 8 agwaralaw@yahoo.com 9 <i>Attorneys for Petitioner</i>	WILLIAM C. SILVIS Assistant Director  <u>/s/ T. Monique Peoples</u> T. MONIQUE PEOPLES Trial Attorney  <i>Attorneys for Respondents</i>
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13           IT IS SO ORDERED:

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15           \_\_\_\_\_  
16           UNITED STATES DISTRICT JUDGE  
17           Dated: March 25, 2016.  
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