1	JOSEPH H. HUNT Assistant Attorney General		
2 3	WILLIAM C. PEACHEY Director, District Court Section		
4	EDWARD S. WHITE Senior Litigation Counsel		
5	JOSEPH F. CARILLI, JR.		
6	N.H. Bar Identification No. 15311 Trial Attorney		
7	United States Department of Justice Civil Division		
8	Office of Immigration Litigation District Court Section		
9	P.O. Box 868, Ben Franklin Station Washington, D.C. 20044		
10	Telephone: (202) 616-4848 E-mail: joseph.f.carilli2@usdoj.gov		
11	Counsel for the Respondent		
12	UNITED STATES DISTRICT COURT		
13	DISTRICT OF NEVADA		
14	MOHAMMAD AL FALAHI,) Case No.: 2:16-cv-02921-JAD-VCF	
15	Petitioner,) Case No 2.10-64-02921-JAD-46F	
16	vs.	JOINT MOTION FOR AN EXTENSION OF TIME TO FILE PRETRIAL ORDER	
17	UNITED STATES CITIZENSHIP AND IMMIGRATION SERVICES,) OF THE TO FILE TRETRIAL ORDER	
18	Respondent.	ORDER	
19))	
20	The above named parties, by and through their respective counsel of record, hereby		
21	jointly move for an extention of time to file the joint pretrial order pursuant to LR IA 6-1.		
22	This is the first motion to extend the time to file the joint pretrial order. Good cause		
23	exists for this extension. The parties are working to reach agreement on issues of fact and law i		
24	order to reduce what the Court must resolve at trial. In addition, Petitioner is changing counsel		
25	and this extension of time will allow for an efficient transfer of representation from Petitioner's		
26	outgoing counsel to his incoming counsel.		
27			
28			

1	Pursuant to the Court's March 31, 2019 order, ECF No. 33, the deadline for filing the		
2	joint pretrial order is May 1, 2019. The Parties respectfully move that the Court extend the		
3	deadline for filing the joint pretrial order by sev	ven (7) days, up to and including May 8, 2019.	
4			
5	Date: April 30, 2019	Respectfully submitted,	
6	/s/ Lauren Kaufman	JOSEPH H. HUNT	
7	LAUREN KAUFMAN Nevada Bar 14677C	Assistant Attorney General	
8	American Civil Liberties Union of Nevada	WILLIAM C. PEACHEY	
9	601 South Rancho Dr. Suite B-11 Las Vegas, NV 89106	Director	
10		EDWARD S. WHITE	
11	AMY ROSE Nevada Bar 12081	Senior Litigation Counsel	
	American Civil Liberties Union of Nevada	/s/ Joseph F. Carilli, Jr.	
12	601 South Rancho Dr. Suite B-11 Las Vegas, NV 89106	JOSEPH F. CARILLI, JR. N.H. Bar Identification No. 15311	
13	Las vegas, ivv 67100	Trial Attorney	
14	ALEXANDRA CHRYSANTHIS	United States Department of Justice Civil Division	
15	Nevada Bar 3231	Office of Immigration Litigation	
16	Prudhomme Law Office	District Court Section	
17	633 S 4th St #7 Las Vegas, NV 89101	P.O. Box 868, Ben Franklin Station Washington, D.C. 20044	
18	Counsel for the Petitioner	Counsel for the Respondent	
19			
20		IT IS SO ORDERED:	
21		Moder	
22		UNITED STATES DISTRICT JUDGE Dated: April 30, 2019.	
23		Dated. April 30, 2019.	
24			
25			
26			
27			
28			