

JOSEPH H. HUNT
Assistant Attorney General
Civil Division
WILLIAM PEACHEY
Director, District Court Section
Office of Immigration Litigation
ELIANIS PEREZ
Assistant Director, District Court Section
Office of Immigration Litigation
MARY LARAKERS, TX Bar # 24093943
Trial Attorney
U.S. Department of Justice, Civil Division
Office of Immigration Litigation
P.O. Box 868, Ben Franklin Station
Washington, D.C. 20044
Tel: (202) 353-4419
Fax: (202) 305-7000
mary.l.larakers@usdoj.gov
Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SATHIRAWAT SAUBHAYANA,

Plaintiff,

v.

WILLIAM P. BARR, U.S. Attorney
General, et al.,

Defendants.

Case No. 2:17-cv-2655-JAD-GWF

**UNOPPOSED MOTION TO EXTEND
TIME TO FILE ANSWER TO
COMPLAINT
(First Request)**

Defendants hereby move to extend the time for the filing of its answer to the complaint until June 13, 2019. This is the first extension of time sought in this action with respect to the Defendants' answer to the complaint. The current filing deadline is May 13, 2019. The requested extension of time is based on the following:

1. This is a challenge to U.S. Citizenship and Immigration Services' ("USCIS") decision to deny Plaintiff's application for naturalization. *See* 8 U.S.C. § 1421(c).
2. Undersigned counsel requires additional time to prepare an answer or otherwise responsive pleading due to the complexity of the immigration issues presented in the complaint and in order to confer with the Defendant agency, USCIS.
3. Plaintiff, through counsel, indicated that he does not oppose this motion for an extension of time, by email on April 29, 2019. To that end, Defendants request an additional 30 days to answer or otherwise respond to the complaint, until June 13, 2019.

Respectfully submitted,

ELIANIS PEREZ
Assistant Director
Office of Immigration Litigation

IT IS SO ORDERED:

DATED: May 8, 2019