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|----|--|------------------------------|--|
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| | Counsel for Plaintiff, | | |
| 6 | Satimawat Sadonayana | COLIDT | |
| 7 | U.S. DISTRICT COURT DISTRICT OF NEVADA | | |
| 8 | LAS VEGAS, NEVADA | | |
| 9 | 9 *** | | |
| 10 | 0 II | SE NO. 2:17-cv-02655-JAD-GWF | |
| | Dlointiff) | ency No. 087 026 142 | |
| 11 | 1 11 | OPPOSED MOTION TO EXTEND | |
| 12 | 2 vs.) TIN | IE TO AMEND COMPLAINT | |
| 13 | WILLIAM P. BARR, U.S. Attorney | | |
| 14 | General, et al., | | |
| 15 | Defendants) | | |
| |) | | |
| 16 | | | |
| 17 | Plaintiff, Sathirawat Saubhayana, through his Counsel hereby moves to extend the time | | |
| 18 | for the filing of the amended complaint until April 16, 2020. This is the second extension of | | |
| 19 | time sought in this action with respect to the Defendants' motion to dismiss. The current filing | | |
| 20 | deadline is March 12, 2020. The requested extension of time is based on the following: | | |
| 21 | 1 /// | | |
| 22 | 2 /// | | |
| 23 | 3 /// | | |
| 24 | 4 /// | | |
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| 26 | 6 /// | | |
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- 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. §1241(c).
- 2. Undersigned counsel requires additional time to file the amended complaint. Counsel has various upcoming deadlines which require substantial preparation:

| March 6, 2020 | 9 th Circuit Reply Brief |
|-------------------|---|
| March 11, 2020 | 9 th Circuit Opening Brief |
| March 12, 2020 | 9 th Circuit Reply Brief |
| March 12, 2020 | District Court Complaint |
| March 12, 2020 | Response to Motion with 9th Circuit |
| March 16, 2020 | 9 th Circuit Reply Brief |
| March 19, 2020 | 9 th Circuit Reply Brief |
| March 23-24, 2020 | Attend and prepare for Oral Argument in San Francisco, California |
| March 25, 2020 | 9 th Circuit Opening Brief |
| March 31, 2020 | Merits Hearing |
| April 1, 2020 | Merits Hearing |
| April 6, 2020 | Merits Hearing |
| April 9, 2020 | Merits Hearing |
| April 15, 2020 | Merits Hearing |

3. Defendants, through counsel, indicated that they do not oppose this motion for an extension of time, by email on March 2, 2020. To that end, Plaintiff requests an additional 45 days to respond to the motion to dismiss, until April 16, 2020.

Respectfully submitted,

/s/ Sylvia L. Esparza Sylvia L. Esparza, Esq. Attorney for Plaintiff

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE