

JOSEPH H. HUNT  
 Assistant Attorney General  
 Civil Division  
 WILLIAM C. PEACHEY  
 Director  
 GISELA A. WESTWATER  
 Assistant Director  
 ANN M. WELHAF  
 Trial Attorney  
 United States Department of Justice  
 Civil Division  
 Office of Immigration Litigation  
 District Court Section  
 P.O. Box 868 Ben Franklin Station  
 Washington, DC 20530  
 Telephone: (202) 305-7171  
 Facsimile: (202) 542-4090  
 Email: ann.welhaf@usdoj.gov

*Attorneys for United States*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

CINDY LICEA,	)	
	)	CASE NO. 2:18-cv-01057-GMN-NJK
	)	
Plaintiff,	)	<b>DEFENDANTS' UNOPPOSED</b>
	)	<b>MOTION TO EXTEND TIME</b>
v.	)	<b>TO FILE REPLY TO PLAINTIFF'S</b>
	)	<b>OPPOSITION TO MOTION TO</b>
U.S. SECRETARY OF STATE	)	<b>DISMISS AMENDED COMPLAINT</b>
MICHAEL POMPEO, DAVID T.	)	
DONAHUE, EDWARD J.	)	
RAMOTOWSKI, DARIA L.	)	
DARNELL,	)	
	)	
Defendants.	)	
_____	)	

1 Federal Defendants, by and through undersigned counsel, move this Court  
2 for an extension of time to file their reply to Plaintiff's Opposition to Defendant's  
3 Motion to Dismiss the Amended Complaint, ECF No. 16. Defendants' reply is  
4 currently due to be filed on or before this Friday November 9, 2018. Undersigned  
5 counsel requests an additional fourteen (14) days in which to file Defendants'  
6 reply, until Friday November 23, 2018. This motion is supported by good cause,  
7 as undersigned counsel has several other pressing professional matters for handling  
8 this week, including travel to the Eleventh Circuit Court of Appeals in Florida for  
9 presentation of oral argument, and other miscellaneous filings that must be  
10 completed. This is Defendants' first request for any extension of any filing  
11 deadline in this case. Defendants' counsel consulted with Plaintiff's counsel, Mr.  
12 Anthony D. Guenther, who advised that he has no objection to the granting of this  
13 motion for an extension of time.  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1           Accordingly, Defendants respectfully move that this Court grant an  
2 extension of time to file their reply until Friday November 23, 2018.

3 DATED: November 5, 2018

Respectfully submitted,

4  
5           JOSEPH H. HUNT  
6           Assistant Attorney General  
7           United States Department of Justice  
8           Civil Division

9           WILLIAM C. PEACHEY  
10           Director

11           GISELA A. WESTWATER  
12           Assistant Director

13           /s/ Ann M. Welhaf  
14           ANN M. WELHAF  
15           Trial Attorney  
16           Email: ann.welhaf@usdoj.gov

17 **IT IS SO ORDERED.**

18 **DATED** this 13 day of November, 2018.

19  
20  
21             
22           \_\_\_\_\_  
23           Gloria M. Navarro, Chief Judge  
24           UNITED STATES DISTRICT COURT  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

1  
2 I certify that on November 5, 2018, I served a copy of the foregoing  
3 DEFENDANTS' UNOPPOSED MOTION TO EXTEND TIME TO FILE  
4 REPLY TO PLAINTIFF'S OPPOSITION TO MOTION TO DISMISS by filing  
5 this document with the Clerk of Court through the CM/ECF system, which will  
6 provide electronic notice and an electronic link to this document to Plaintiff's  
7 attorney of record:  
8  
9

10  
11 /s/ Ann M. Welhaf  
12 ANN M. WELHAF  
13 Trial Attorney  
14 United States Department of Justice  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28