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11 *Attorneys for Defendants*

12 **UNITED STATES DISTRICT COURT**  
 13 **DISTRICT OF NEVADA**

14 THOMAS DAWSON REUTER and  
 15 DULCE VICTORIA GALINDO FELIX,

16 Plaintiff,

17 v.

18 ANTONY BLINKEN, U.S. Secretary of  
 19 State; ERIC S. COHAN, Consul General,  
 20 U.S. Consulate in Ciudad Juarez, Mexico;  
 21 ALEJANDRO MAYORKAS, Secretary of  
 22 U.S. Department of Homeland Security;  
 23 MERRICK B. GARLAND, U.S. Attorney  
 24 General, in their Office Capacities,

25 Defendants.

26 Case No. 2:20-cv-02180-JCM-BNW

27 **Stipulation and Order for Extension  
 28 of Time**

**(First Request)**

29 Plaintiffs Thomas Dawson Reuter and Dulce Victoria Galindo Felix, and  
 30 Defendants Antony Blinken, U.S. Secretary of State; Eric S. Cohan, Consul General, U.S.  
 31 Consulate in Ciudad Juarez, Mexico; Alejandro Mayorkas, Secretary of U.S. Department of  
 32 Homeland Security; and Merrick Garland, U.S. Attorney General (“Defendants”) hereby  
 33 stipulate and agree that Defendants may have a 30-day extension of time, from September  
 34 14, 2021 to October 14, 2021, to reply to Plaintiff’s Response in Opposition to Defendants’  
 35 Motion to Dismiss (ECF No. 31).

1 An extension is needed because defense counsel only recently learned she will need  
2 to undergo a medical procedure that will require at least two and a half weeks of recovery.  
3 Under the circumstances, good cause exists to extend the time for Defendants to reply to  
4 Plaintiff's Response in Opposition to Defendants' Motion to Dismiss. *See* Fed. R. Civ. P.  
5 6(b)(1)(A) ("When an act may or must be done within a specified time, the court may, *for*  
6 *good cause*, extend the time...with or without motion or notice if the court acts, or if a request  
7 is made, before the original time or its extension expires[.]") (emphasis added).

8 This is Defendants' first request for an extension of time. *See* LR IA 6-1(a) (must  
9 advise of previous extensions). Defense counsel contacted Plaintiff's counsel regarding this  
10 extension request, and he has advised that he does not oppose the request. This stipulation  
11 is made in good faith and not for the purpose of undue delay.

12 Dated: September 9, 2021.

13 LAW OFFICE OF FELIPE D.J.  
14 MILLAN, P.C.

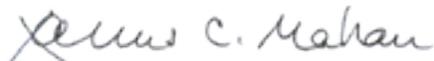
CHRISTOPHER CHIOU  
Acting United States Attorney

15 /s/ Felipe D.J. Millan  
16 *FELIPE D.J. MILLAN*  
17 Attorney for Plaintiffs

/s/ Holly A. Vance  
HOLLY A. VANCE  
Assistant United States Attorney

18 **DATED:** September 9, 2021

**IT IS SO ORDERED:**

19   
20 JESUS C. MAHAN  
21 UNITED STATES DISTRICT JUDGE  
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