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8 *Attorneys for Defendants*

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

10 Isabel Solorzano and  
 11 Ronaldo Yersay Palacos Cardona,

12 Plaintiffs,

13 v.

14 DONNA P. CAMPAGNOLO, Director,  
 California Service Center, U.S. Citizenship  
 and Immigration Services, in her official  
 15 capacity as well as her successors and assign;

16 ALEJANDRO MAYORKAS, Secretary,  
 Department of Homeland Security, in his  
 17 official capacity as well as his successors and  
 assigns;

18 UR MENDOZA JADDOU, Director, U.S.  
 19 Citizenship and Immigration Services, in her  
 official capacity as well as her successor and  
 20 assigns;

21 ANTONY BLINKEN, Secretary of State, in  
 his official capacity as well as his successor  
 22 and assigns;

23 PHILLIP SLATTERY, Director, National  
 Visa Center, U.S. Department of State, in his  
 24 official capacity as well as his successors and  
 assigns; and

25 RICHARD C. VISEK, Acting Legal  
 26 Advisor, U.S. Department of State, in his  
 official capacity as well as his successors and  
 27 assigns,

28 Defendants.

Case No. 2:24-cv-00240-GMN-DJA

**Stipulation and Order for Extension of  
 Time to Respond to Plaintiffs'  
 Complaint (First Request)**

1 Plaintiffs and Defendants, through their undersigned counsel, stipulate and request  
2 that the Court approve a 60-day extension of time, from April 15, 2024, to June 15, 2024,  
3 for Defendants to respond to Plaintiffs' Complaint, ECF. No. 1. This is the parties' first  
4 request for an extension of time.

5 Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule IA 6-1 allow a party to  
6 request additional time to perform an act. The subject of this litigation concerns Plaintiffs' I-  
7 129F Petition for Alien Fiancée ("First Petition"). On or about December 28, 2020, Plaintiffs  
8 submitted to Defendants' U.S. Citizen and Immigration Services ("USCIS") their First  
9 Petition, which was approved by USCIS and then forwarded to National Visa Center  
10 ("NVC") and the United States Consulate ("Consulate") for processing. The First Petition  
11 was subsequently cancelled, and Plaintiffs were informed that a new I-129F Petition (Second  
12 Petition) should be submitted. USCIS approved Plaintiffs' Second Petition on or about  
13 March 13, 2024, and Plaintiffs are now awaiting processing of the Second Petition by the  
14 NVC and Consulate. Pending the remaining administrative processing of the Second  
15 Petition this litigation may become moot.

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1 Based on these circumstances, the parties request an additional 60-day extension of  
2 time, from April 15, 2024, to June 15, 2024, for Defendants to file a response to Plaintiffs'  
3 Complaint, ECF. No. 1. This stipulated request is filed in good faith and not for the purposes  
4 of undue delay.

5 Respectfully submitted this 25<sup>th</sup> day of March 2024.

6  
7 DATED: March 25, 2024

DATED: March 25, 2024

8 QUIROGA LAW OFFICE, PLLC

JASON M. FRIERSON  
United States Attorney

9  
10 /s/ Maria E. Quiroga  
MARIA E. QUIROGA

/s/ Ann Wilkinson  
ANN WILKINSON  
Assistant United States Attorney

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13 **IT IS SO ORDERED:**

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15 \_\_\_\_\_  
DANIEL J. ALBRECHTS  
16 **UNITED STATES MAGISTRATE JUDGE**

17 DATED: 3/26/2024

**Certificate of Service**

I, Danielle Bleecker, Paralegal Specialist, hereby certifies that on March 25, 2024 I electronically filed and served the foregoing **STIPULATION AND ORDER FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' COMPLAINT (First Request)** with the Clerk for the United States District Court for the District of Nevada using the CM/ECF system; and served the same using the Court's CM/ECF system to:

Maria E. Quiroga, Esq.  
QUIROGA LAW OFFICE PLLC  
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Maria.QuirogaLawOffice.com  
*Attorney for Plaintiffs*

Dated this 25th day of March 2024.

*/s/ Danielle Bleecker*  
DANIELLE BLEECKER