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7 *Attorneys for the Federal Defendants*

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

10 Juan Francisco Eguizabal Valiente, Sandra
Patricia Lopez de Eguizabal, Oscar
11 Geovanny Eguizabal Lopez, Josue Arturo
Eguizabal Lopez, and Emanuel Isaac
12 Eguizabal Lopez,

13 Plaintiffs,

14 v.

15 Loren K. Miller, Alejandro Mayorkas, and
Ur Mendoza Jaddou,

16 Defendants.
17

Case No. 2:24-cv-02415-JCM-MDC

**Stipulation and Order to Extend Time
to Answer**

(First Request)

18 Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule IA 6-1 of
19 this Court's Local Rules, Plaintiffs Juan Francisco Eguizabal Valiente, Sandra Patricia
20 Lopez de Eguizabal, Oscar Geovanny Eguizabal Lopez, Josue Arturo Eguizabal Lopez,
21 and Emanuel Isaac Eguizabal Lopez, and Federal Defendants Loren K. Miller, Alejandro
22 Mayorkas, and Ur Mendoza Jaddou, through undersigned counsel, hereby stipulate and
23 agree as follows:

24 Plaintiffs filed their Complaint for Declaratory and Injunctive Relief and for Writ of
25 Mandamus on December 30, 2024. ECF No. 1.

26 Plaintiffs served Federal Defendants with a copy of the Summons and Complaint
27 via certified mail on January 10, 2025.
28

1 The current deadline for Federal Defendants to respond to Plaintiffs' Complaint is
2 March 11, 2025.

3 On March 7, 2025, undersigned counsel for Plaintiffs and Federal Defendants
4 agreed to a 45-day extension of time for Federal Defendants to review the record and
5 continue gathering information from agency counsel, as well as insulate against any delays
6 from a potential government shutdown. The standard for extending time is good cause. *See*
7 FRCP 6(b)(1)(A).

8 Accordingly, the parties, through undersigned counsel, submit this stipulation to a
9 45-day extension from March 11, 2025, to **April 25, 2025**, for Federal Defendants to file a
10 response to the Complaint. This is Federal Defendants' first request for an extension of
11 time.

12 This stipulated request is filed in good faith and not for the purposes of undue delay.

13 Respectfully submitted this 11th day of March 2025.

14 QUIROGA LAW OFFICE, PLLC

15 /s/ Maria E. Quiroga
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22 VIRGINIA T. TOMOVA
23 Assistant United States Attorney

24 *Attorneys for the Federal Defendants*

25 **IT IS SO ORDERED:**

26 
27 **UNITED STATES MAGISTRATE JUDGE**

28 **DATED:** 3-12-25