

1 BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General
2 JOSEPH E. BORSON
Assistant Director
3 JOHN ROBINSON
Trial Attorney
4 U.S. Department of Justice
Civil Division, Federal Programs Branch
5 1100 L Street NW
Washington, DC 20005
6 (202) 616-8489
john.j.robinson@usdoj.gov

7 *Attorneys for Defendants*

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

10 WASHOE COUNTY, a political subdivision of
11 the State of Nevada,

12 Plaintiff,

13 v.

14 LOUIS DEJOY, *in his official capacity as*
Postmaster General of the United States, and the
15 UNITED STATES POSTAL SERVICE,

16 Defendants.

Case No. 3:24-cv-00224-ART-CSD

**Stipulation and Order to Extend
Defendants' Answering Deadline**

(Second Request)

17 Pursuant to LR IA 6-1, the parties stipulate that Defendants' deadline to answer or
18 otherwise respond to Plaintiff's Complaint (ECF No. 1) will be extended by twenty-six days,
19 from September 4, 2024, to September 30, 2024. The reasons for this stipulation are as
20 follows.

21 1. On May 28, 2024, Plaintiff filed its Complaint in this matter, alleging, among
22 other things, that the U.S. Postal Service acted *ultra vires* by implementing the network
23 optimization phase of its "Delivering for America" plan without first seeking an advisory
24 opinion from the Postal Regulatory Commission. Plaintiff also challenged the Postal
25 Service's plans to move certain processing operations from Reno to Sacramento. *See*
26 Compl. ¶¶ 68–69.

27 2. On August 22, 2024, the Postal Service filed a "notice of pre-filing
28 conference" with the Postal Regulatory Commission regarding its intent to seek an advisory

opinion on its plans to transform its processing and transportation networks. *See* Ex. A. Specifically, the Postal Service intends to seek an advisory opinion on its plans to “create a network of Regional Processing and Distribution Centers or Campuses (RPDCs) and Local Processing Centers (LPCs)” and to “implement on a nationwide basis the Regional Transportation Optimization (RTO) initiative.” *Id.* at 3. The notice also states that “with respect to the mail processing facility reviews (MPFRS) that the Postal Service conducted in preparation for implementing certain of the changes,” which would include the MPFR for the Reno facility, there will be “no additional movement of processing operations associated with these MPFRS . . . until January 2025 at the earliest.” *Id.* at 6.

3. The Postal Service intends to hold the pre-filing conference on September 5, 2024, and to file a request for an advisory opinion with the Postal Regulatory Commission shortly thereafter.

4. Additionally, on August 27, 2024, the Postal Service announced that the Reno Postal facility will continue certain local originating mail processing operations. *See* Ex. B. No mail processing operations associated with the Reno facility will move, if at all, until January 2025, at the earliest.

5. In light of these developments, the parties believe that it is in the interest of judicial economy to extend Defendants’ answer deadline to September 30, 2024, to allow the parties time to review the Postal Service’s request for an advisory opinion and to discuss possible next steps in this case in light of that request.

6. This is the second stipulation to extend time for Defendants to answer or otherwise respond to the complaint.

IT IS SO STIPULATED.

Dated: August 29, 2024

1 CHRISTOPHER J. HICKS BRIAN M. BOYNTON
2 Washoe County District Attorney Principal Deputy Assistant Attorney General

3
4
5 LINDSAY L. LIDDELL JOSEPH E. BORSON
6 Deputy District Attorney Assistant Director

7 /s/ Lindsay L. Liddell
8 Attorney for Plaintiff

/s/ John Robinson
Attorney for Defendants

9
10
11 IT IS SO ORDERED.

12
13 
14 United States Magistrate Judge

15
16 DATED: August 30, 2024

17
18
19
20
21
22
23
24
25
26
27
28