

The Honorable James L. Robert

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

Maria Mora-Villalpando,

Plaintiff,

v.

U.S. Immigration and Customs Enforcement,  
U.S. Customs and Border Protection, and U.S.  
Citizenship and Immigration Services,  
Defendants.

No. C18-655-JLR

Stipulation and Proposed Order  
for a One Week Extension

Note on Motion Calendar: December 13, 2018

The parties hereby request a one-week extension of the deadlines for filing motions for summary judgment and responses in the Court's Stipulation and Order for Deadlines (Dkt. #31).

Good cause is shown for the extension. Defendant ICE has been working diligently to draft a declaration in support of defendants' motion for summary judgment, but because of the extensive nature of the search for documents conducted, it needs a few more days to complete that declaration. The additional time will ensure that the declaration is thorough and comprehensive.

1 Therefore, the parties agree that Defendants will file their motion for summary judgment  
2 by December 24, 2018. Plaintiff shall file its response to Defendants' motion for summary  
3 judgment and any cross motion for summary judgment within 30 days thereafter. Defendants  
4 shall serve a reply to Plaintiff's response and cross motion 30 days thereafter.

5 Dated this 13<sup>th</sup> day of December, 2018

6 /s/ Khaled Alrabe

7 Elizabeth G. Simpson, NC #41596 (admitted *pro*  
8 *hace vice*)

9 Khaled Alrabe, NY Bar Reg. 5542311 (admitted  
*pro hace vice*)

10 NATIONAL IMMIGRATION PROJECT  
OF THE NATIONAL LAWYERS GUILD  
89 South St. Suite 603  
Boston, MA 02111

11 Ph. (617) 412-6794

12 Ph. (703) 587-8563

13 Em. [elizabeth@nipnlg.org](mailto:elizabeth@nipnlg.org)

Em. [khaled@nipnlg.org](mailto:khaled@nipnlg.org)

14 /s/ Devin T. Theriot-Orr

15 Devin T. Theriot-Orr, WSBA #33995

16 SUNBIRD LAW, PLLC  
1001 4<sup>th</sup> Avenue, Suite 3200  
Seattle, WA 98154

17 Ph. (206) 962-5052

18 Fax (206) 681-9663

Em. [devin@sunbird.law](mailto:devin@sunbird.law)

19 ANNETTE L. HAYES

United States Attorney

20 s/ Brian C. Kipnis

21 BRIAN C. KIPNIS

22 s/ Sarah K. Morehead

SARAH K. MOREHEAD, WSBA #29680

23 Assistant United States Attorneys

Office of the United States Attorney

Suite 5220, United States Courthouse

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23

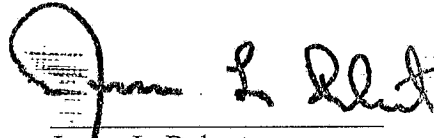
700 Stewart Street  
Seattle, Washington 98101-1271  
Phone: 206-553-7970  
Fax: 206-553-4073  
Email: [brian.kipnis@usdoj.gov](mailto:brian.kipnis@usdoj.gov)  
Email: [sarah.morehead@usdoj.gov](mailto:sarah.morehead@usdoj.gov)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23

**ORDER**

The parties having so stipulated, IT IS ORDERED that the stipulation is granted. The parties will comply with the deadlines set forth above.

Dated this 13<sup>th</sup> day of December, 2018.



James L. Robart  
United States District Judge