

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

CASA de Maryland, Inc., et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States,
et al.,

Defendants.

Civil Action No. 8:19-cv-2715-PWG

PLAINTIFFS' UNOPPOSED MOTION TO MODIFY SCHEDULING ORDER

On Friday, December 6, 2019, *Mayor & City Council of Baltimore v. U.S. Dep't of Homeland Security*, No. 8:19-cv-2851-PWG, was transferred from Judge Messitte to this Court. Following this transfer and upon further reflection, the City of Baltimore has determined that its interests would be best served by joining the complaint filed by CASA de Maryland, Inc., et al., and, in turn, representing Baltimore as co-counsel with the attorneys that currently represent Plaintiffs in *CASA de Maryland, Inc. v. Trump*, No. 19-cv-2715-PWG.

In order to effectuate this change, Plaintiffs in *CASA de Maryland* will need to amend their complaint to add allegations relating to the City of Baltimore and to obtain necessary waivers of conflicts of interest. Currently, Plaintiffs' deadline to amend their complaint is this Friday, December 20. ECF No. 81. Plaintiffs intend to obtain the necessary waivers and to make the additional amendments expeditiously. However, Plaintiffs request a two-week extension, to January 3, 2020, in order to have enough time to fully develop the facts necessary for adding a new party to the case. Plaintiffs further seek a matching extension of the timeline for the briefing of Defendants' motion to dismiss to no earlier than February 5, 2020, for the

motion; February 26, 2020, for the response; and March 11, 2020 for the reply, in the event that the Court denies Defendants’ Motion to Stay Proceedings, ECF No. 84. Defendants have consented to this request.

Accordingly, Plaintiffs respectfully request that the Court modify the schedule issued by Paperless Order at ECF No. 81 to provide the following deadlines:

Plaintiffs’ Second Amended Complaint	January 3, 2020
Defendants’ Motion to Dismiss	February 5, 2020, or within 21 days of a denial of Defendants’ Motion to Stay Proceedings—whichever date is later.
Plaintiffs’ Memorandum in Opposition to Defendants’ Motion to Dismiss	February 26, 2020, or within 21 days of Defendants’ filing of their Motion to dismiss—whichever date is later.
Defendants’ Reply in Further Support of Their Motion to Dismiss	March 11, 2020, or within 14 days of Plaintiffs’ filing of their Memorandum in Opposition to Defendants’ Motion to Dismiss—whichever date is later.

December 18, 2019

Respectfully submitted,

/s/ Jonathan L. Backer

Jonathan L. Backer (D. Md. 20000)

Amy L. Marshak*

Joshua A. Geltzer*

Mary B. McCord*

INSTITUTE FOR CONSTITUTIONAL ADVOCACY
AND PROTECTION

Georgetown University Law Center

600 New Jersey Ave., N.W.

Washington, D.C. 20001

(202) 662-9835

jb2845@georgetown.edu

Attorneys for Plaintiffs

**Admitted pro hac vice*