

1 BRIAN M. BOYNTON  
2 ACTING ASSISTANT ATTORNEY GENERAL

3 BRIGHAM J. BOWEN  
4 ASSISTANT BRANCH DIRECTOR

5 Michael F. Knapp (CA Bar No. 314104)  
6 Adam Kirschner (IL Bar No. 6286601)  
7 Brian C. Rosen-Shaud (ME Bar No. 006018)  
8 Kuntal Cholera (DC Bar No. 1031523)  
9 U.S. Department of Justice  
10 Civil Division, Federal Programs Branch  
11 1100 L Street, NW Room 12008  
12 Washington, D.C. 20530  
13 (202) 514-2071 (telephone)  
14 (202) 616-8470 (facsimile)  
15 Email: Michael.F.Knapp@usdoj.gov  
16 Adam.Kirschner@usdoj.gov  
17 Brian.C.Rosen-Shaud@usdoj.gov  
18 Kuntal.Cholera@usdoj.gov

19 *Counsel for Defendants*

20 **UNITED STATES DISTRICT COURT**  
21 **DISTRICT OF ARIZONA**

22 State of Arizona, et al.,  
23 Plaintiffs,

24 v.

25 United States Department of Homeland  
26 Security, et al.,  
27 Defendants.

No. 2:21-cv-00186-SRB

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME FOR  
DEFENDANTS TO ANSWER OR  
RESPOND TO AMENDED  
COMPLAINT  
(First Request)**

28

1 Defendants hereby move this Court, pursuant to Federal Rule of Civil Procedure  
2 15(a)(3) and Local Rule 7.3, to extend the time for Defendants to answer or respond to  
3 Plaintiffs' Amended Complaint (ECF No. 12) until 30 days after the Court rules on Plaintiffs'  
4 pending Motion for Preliminary Injunction (ECF No. 17).

5 Plaintiffs completed service on the U.S. Attorney for the District of Arizona on  
6 February 5, 2021. ECF No. 11. On March 8, 2021, Plaintiffs filed an Amended Complaint.  
7 ECF No. 12. Plaintiffs have also filed a motion for preliminary injunction, ECF No. 17, which  
8 Defendants have opposed, ECF No. 26. Under Federal Rules of Civil Procedure 12(a)(2) and  
9 15(a)(3), Defendants deadline to answer or otherwise respond to the Amended Complaint is  
10 April 6, 2021.

11 Defendants respectfully request that the Court extend Defendants' time to answer or  
12 otherwise respond to the Amended Complaint until 30 days after the Court resolves Plaintiffs'  
13 Motion for Preliminary injunction. Defendants have conferred with Plaintiffs concerning this  
14 motion and Plaintiffs do not oppose the relief requested.

15 Good cause exists for such an extension. The Court's resolution of Plaintiffs' Motion  
16 for Preliminary Injunction is likely to substantially affect subsequent proceedings in this  
17 litigation. Accordingly, extending the time for Defendants to answer or otherwise respond  
18 until 30 days after the Court resolves that motion will likely conserve the Parties' and the  
19 Court's resources. No previous extensions have been sought or granted.

20 RESPECTFULLY SUBMITTED this 30th day of March, 2021.

21  
22 BRIAN M. BOYNTON  
23 Acting Assistant Attorney General

24 BRIGHAM J. BOWEN  
25 Assistant Branch Director  
26 Federal Programs Branch

27 /s/ Michael F. Knapp  
28 MICHAEL F. KNAPP  
CA Bar No. 314104  
Trial Attorney

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

ADAM KIRSCHNER  
IL Bar No. 6286601  
Senior Trial Counsel  
BRIAN C. ROSEN-SHAUD  
ME Bar No. 006018  
KUNTAL CHOLERA  
DC Bar No. 1031523  
Trial Attorneys  
U.S. Department of Justice  
Civil Division, Federal Programs Branch  
1100 L Street, NW Room 12008  
Washington, D.C. 20530  
(202) 514-2071 (telephone)  
(202) 616-8470 (facsimile)  
Email: Michael.F.Knapp@usdoj.gov  
Adam.Kirschner@usdoj.gov  
Brian.C.Rosen-Shaud@usdoj.gov  
Kuntal.Cholera@usdoj.gov

EREZ REUVENI  
CA Bar No. 264124  
Assistant Director  
U.S. Department of Justice  
Civil Division, Office of Immigration Litigation  
P.O. Box 868, Ben Franklin Station  
Washington, D.C. 20044  
202-307-4293 (telephone)  
Email: Erez.R.Reuveni@usdoj.gov

*Counsel for Defendants*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA**

State of Arizona, et al.,  
Plaintiffs,

v.

United States Department of Homeland  
Security, et al.,  
Defendants.

No. 2:21-cv-00186-SRB

**[PROPOSED] ORDER**

Upon consideration of Defendants' Motion for Extension of Time for Defendants to Answer or Respond to Amended Complaint, the Court rules as follows.

IT IS HEREBY ORDERED that Defendants shall answer or otherwise respond to Plaintiffs' Amended Complaint (ECF No. 12) no later than 30 days after the Court rules on Plaintiffs' pending Motion for Preliminary Injunction (ECF No. 17).