

U.S. Department of Justice
Civil Division
Office of Immigration Litigation
District Court Section

September 23, 2024

VIA ECF

The Honorable Michael E. Farbiarz
United States District Judge
District of New Jersey
Dr. Martin Luther King, Jr. Building & U.S. Courthouse
50 Walnut St.
Newark, NJ 07102

Re: Doe, et al. v. U.S. Department of Homeland Security, et al., No. 2:24-cv-9105.

Dear Judge Farbiarz:

This office represents the federal Defendants in the above-referenced matter. I respectfully write, with the consent of opposing counsel, to request an extension of Defendants' deadline to file their opposition to Plaintiffs' Motion for Class Certification and Appointment of Class Counsel, ECF No. 2, until November 6, 2024. Good cause exists for this request. Plaintiffs noticed their motion for October 7, 2024, which set Defendants' response deadline for September 23, 2024. Defendants believe an extension until November 6, 2024, is reasonable and necessary to adequately respond to the motion and the filings Plaintiffs submitted.

This is Defendants' first request for an extension of time to respond to Plaintiffs' Motion for Class Certification and Appointment of Class Counsel. Undersigned counsel conferred with Plaintiffs' counsel who consents to the extension.

Thank you for the Court's consideration of this matter.

Respectfully submitted,

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cc: Counsel of Record (via ECF)