

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

ZANDER SCHLACTER, et al.

Plaintiffs,

v.

U.S. DEPARTMENT OF STATE, *et al.*

Defendant.

Case No. 1:25-cv-01344

CONSENT MOTION FOR EXTENSION OF TIME

Defendants, by and through undersigned counsel, pursuant to Fed. R. Civ. P. 6(b), and with Plaintiffs' consent, through their attorneys, move to extend their deadline to respond to Plaintiffs' Complaint to 30 days after the Court rules on Plaintiffs' Motion for Preliminary Injunction, and in support thereof state:

1. This matter arises out of Plaintiff's April 25, 2025 filing of a Complaint for Declaratory and Injunctive Relief (ECF No. 1) and May 14, 2015 filing of a Motion for Preliminary Injunction (ECF No. 31).

2. The Motion for Preliminary Injunction has been fully briefed, *see* ECF Nos. 31 (Motion), 46 (Response in Opposition), and 53 (Reply), and remains pending. In the meantime, Defendants' deadline to respond to Plaintiff's Complaint is 60 days after service, or July 7.

4. Given that the Motion for Preliminary Injunction remains pending and that Defendants' deadline to respond to Plaintiffs' Complaint is fast approaching, Defendants, with Plaintiffs' consent, seek to extend their response deadline to 30 days after the Court rules on the Motion for Preliminary Injunction. The extension will conserve resources, time, and energy the

parties may otherwise spend litigating issues that may be resolved or narrowed by the Court's ruling.

5. Plaintiffs, through counsel, consent to the relief requested herein.

6. This request is not made for purposes of delay, and no party will be prejudiced by the relief requested herein, particularly because Plaintiffs consent to the same.

7. Accordingly, Defendants request that the Court extend their response deadline to 30 days after it rules on Plaintiffs' Motion for Preliminary Injunction.

WHEREFORE, Defendants respectfully request that this Court grant this Consent Motion for Extension of Time.

Respectfully submitted,

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United States Attorney

/s/ Melissa E. Goldmeier
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