

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

Civil Action No. 1:17-cv-289-RBJ

ZAKARIA HAGIG,

Plaintiff,

v.

DONALD J. TRUMP, *et al.*

Defendants.

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
AMENDED CLASS ACTION COMPLAINT**

Defendants, by and through undersigned counsel, hereby submit this Unopposed Motion for a 60-day extension of time for Defendants to respond to Plaintiff's First Amended Class Action Complaint for Declaratory and Injunctive Relief ("Amended Class Action Complaint").

ECF 13. In support of their motion, Defendants state as follows:

1. Under D.C.COLO.LCiv.R. 7.1A, Defendants' counsel certifies that they have conferred with Plaintiff's counsel who does not oppose the extension.
2. Plaintiff filed his Amended Class Action Complaint on February 10, 2017. ECF 13.
3. Defendants filed a Stipulated Extension of Time to Respond to Amended Class Action Complaint on April 3, 2017. ECF 25.
4. Defendants' answer or other responsive pleading to the Amended Class Action Complaint is currently due Monday, April 24, 2017.

5. On March 6, 2017, the President signed an Executive Order titled “Protecting the Nation from Foreign Terrorist Entry into the United States” (the “New EO”), which Executive Order had an effective date of March 16, 2017. *See* Notice to Court [ECF 21], and Amended Notice [ECF 22].

6. The New EO is currently being litigated in various other forums, including in the United States District Court for the District of Hawaii, Case 1:17-cv-00050-DKW-KSC, where the court issued a preliminary injunction on March 29, 2017, and in United States District Court for the District of Maryland, Case 8:17-cv-00361-TDC, where the court issued a temporary restraining order that was appealed to the Fourth Circuit on March 17, 2017.

7. Good cause therefore exists, for reasons of judicial efficiency and economy, to extend Defendants’ time to respond to the Amended Class Action Complaint. Because these other courts’ nationwide injunction and restraining order has enjoined the enforcement of the New EO and because those proceedings are ongoing, the parties have agreed to an extension of 60 days for Defendants to respond to the Amended Class Action Complaint.

8. The requested extension is reasonable and will not prejudice Plaintiff. Plaintiff does not oppose the extension. The requested relief will simplify and streamline the proceedings.

9. Pursuant to D.C.COLO.LCivR 6.1(b), undersigned counsel certifies that Defendants filed one stipulated extension to respond to Plaintiff’s Amended Class Action Complaint. *See* ECF 25.

10. Pursuant to D.C.COLO.LCivR 6.1(c), undersigned counsel certifies that a copy of this motion will be served on Plaintiff and upon an agency representative for Defendants.

11. For the reasons stated above, Defendants respectfully request that the deadline to respond to Plaintiff's Amended Class Action Complaint be extended by 60 days to June 23, 2017.

Respectfully submitted,

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By: /s/ Adrian M. Pandev
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DATE: April 21, 2017

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2017, I electronically filed the foregoing Motion using the Court's CM/ECF system, causing a notice of filing to be served upon all counsel of record. I also hereby certify that on April 21, 2017, I caused the foregoing document to be served via email upon an agency representative for Defendants.

Dated: April 21, 2017

/s/ Adrian M. Pandev _____
ADRIAN M. PANDEV
Trial Attorney