



U.S. Department of Justice

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Eastern District of New York*

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April 2, 2020

Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Bing Guan, et al. v. Chad F. Wolf, et al.,*
Civil No. 19-CV-6570 (PKC/JO)

Dear Judge Chen:

On account of the extraordinary disruption to Government operations caused by the current pandemic crisis, we respectfully seek a 45-day extension of time to serve the Government's motion to dismiss the complaint in the above-referenced action. Under the briefing schedule endorsed by the Court on March 6, the Government's deadline to serve its motion papers is this coming Monday, April 6. Although we have been diligently working to draft our motion papers, the disruptions stemming from the pandemic have engendered significant delays, especially in this Office's ability to obtain the necessary supporting declarations from its client agencies, including U.S. Customs and Border Protection. This is the first extension sought by either side since the briefing schedule was set on March 6. We have conferred with counsel for the Plaintiffs and have been authorized by them to inform the Court that Plaintiffs do not oppose the requested extension.

If our request is approved, the Government's deadline to serve its motion to dismiss would be May 21; Plaintiffs' deadline to serve their opposition would be June 26; and the Government's deadline to serve its reply and file the fully-briefed motion would be July 24. We humbly appreciate the Court's time and attention to this matter.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ {FILED ELECTRONICALLY}
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