



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

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May 26, 2021

BY ECF

The Honorable Ramon E. Reyes, Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Bing Guan, et al. v. Alejandro Mayorkas, et al.*,
Civ. No. 19-CV-6570 (Chen, J.) (Reyes, M.J.) (E.D.N.Y.)

Dear Judge Reyes:

This Office represents Defendants Alejandro Mayorkas, Troy Miller, and Tae Johnson (collectively, "Defendants") in the above-referenced action commenced by Plaintiffs. The parties respectfully request a two-week extension of time, from May 28 to June 11, 2021, to serve their initial disclosures.

By way of background, Plaintiffs allege a First Amendment violation in connection with their referral to secondary inspection and subsequent questioning at various points of entry by Defendants upon their return to the United States. On April 21, 2021, counsel for the parties appeared before the Court for an initial conference in this case. The Court ordered the parties to serve initial disclosures pursuant to Federal Rule of Civil Procedure 26(a) by May 28, 2021, and to file a protective order prior to exchanging initial disclosures. *See* Minute Order (Apr. 21, 2021).

The parties respectfully request a two-week extension of time, from May 28 to June 11, 2021 to serve their initial disclosures. This extension is necessary because the parties need additional time to review and finalize the protective order for this case, which will need to be filed and endorsed by the Court prior to the exchange of initial disclosures. On May 24, 2021, Defendants provided a proposed protective order to Plaintiffs. The extension will provide Plaintiffs additional time to review the protective order and will enable the parties to have sufficient time to finalize the protective order. This request does not affect any other discovery deadlines in this case.

The parties thank the Court for its consideration of this request.

Respectfully submitted,

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By: /s/
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cc: **BY ECF**
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