

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

---

DR. KUSUMA NIO, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF  
HOMELAND SECURITY, *et al.*,

Defendants.

---

)  
)  
)  
) Civil Action No. 1:17-00998-ESH  
)  
)  
)  
)  
)  
)  
)  
)  
)

**DEFENDANTS' UNOPPOSED MOTION FOR AN EXTENSION OF TIME IN WHICH TO  
FILE SIX-WEEK REPORT**

On November 20, 2019, this Court instructed Defendants to file the next Six-Week Report in this case by December 11, 2019, at 5:00 p.m. ECF No. 286, at 1. Defendants respectfully request an additional 24 hours, until December 12, 2019, no later than 5:00 p.m., in which to file the next Six-Week Report. The requested extension is supported by good cause in that it will enable Defendants to gather and conform the data to the Court's requirements, and reduce the likelihood of presenting inaccurate information. Further, an extension of 24 hours, until December 12, 2019, will not encumber the Court's or Plaintiff's understanding of Defendants' progress in adjudicating class member applications because the next status conference hearing is not scheduled until January 21, 2020, and the parties' joint status report is not due until January 10, 2020. ECF No. 286, at 2. On December 10, 2019, counsel for Plaintiffs, Douglas Baruch, indicated via email that Plaintiffs do not oppose this request for an extension.

WHEREFORE, the Court should grant Defendants' motion for a 24-hour extension of the time to file the next Six-Week Report, until December 12, 2019, no later than 5:00 p.m.

DATED: December 11, 2019

Respectfully submitted,

JOSEPH H. HUNT  
Assistant Attorney General  
Civil Division

WILLIAM C. PEACHEY  
Director, Office of Immigration Litigation

COLIN A. KISOR  
Deputy Director

ELIANIS N. PEREZ  
Assistant Director

By: */s/ C. Frederick Sheffield*  
C. FREDERICK SHEFFIELD  
Senior Litigation Counsel  
U.S. Department of Justice, Civil Division  
Office of Immigration Litigation –  
District Court Section  
P.O. Box 868, Washington, D.C. 20044  
Telephone: 202-532-4737  
Facsimile: 202-305-7000  
Email: carlton.f.sheffield@usdoj.gov

ATTORNEYS FOR DEFENDANTS

**CERTIFICATE OF SERVICE**  
Civil Action No. 1:17-00998-ESH

I HEREBY CERTIFY that on this 11th day of December, 2019, a true copy of the foregoing was filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing via e-mail to the following:

Douglas W. Baruch  
MORGAN, LEWIS & BOCKIUS LLP  
1111 Pennsylvania Ave, NW  
Washington, DC 20004  
(202) 739-3001  
Douglas.baruch@morganlewis.com

ATTORNEY FOR PLAINTIFFS

*/s/ C. Frederick Sheffield*  
\_\_\_\_\_  
C. FREDERICK SHEFFIELD  
Senior Litigation Counsel  
United States Department of Justice

ATTORNEY FOR DEFENDANTS