

1 JEFFREY BOSSERT CLARK
 Acting Assistant Attorney General
 2 ERIC R. WOMACK
 Assistant Director, Federal Programs Branch
 3 JOSEPH E. BORSON (Va. Bar No. 85519)
 KUNTAL CHOLERA
 4 ALEXIS ECHOLS
 DENA M. ROTH
 5 Trial Attorney, Federal Programs Branch
 1100 L Street, NW
 6 Washington, D.C. 20005
 (202) 514-1944
 7 joseph.borson@usdoj.gov
 Attorneys for Defendants

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 9 **UNITED STATES DISTRICT COURT**
 10 **EASTERN DISTRICT OF WASHINGTON**
 11 **AT YAKIMA**

12 STATE OF WASHINGTON, STATE OF
 13 COLORADO, STATE OF CONNECTICUT,
 STATE OF ILLINOIS, STATE OF
 14 MARYLAND, STATE OF MICHGAN,
 15 STATE OF MINNESOTA, STATE OF
 16 NEVADA, STATE OF NEW MEXICO,
 STATE OF OREGON, STATE OF RHODE
 17 ISLAND, STATE OF VERMONT,
 18 COMMONWEALTH OF VIRGINIA, and
 STATE OF WISCONSIN,

19 Plaintiffs,

20 v.

21 DONALD J. TRUMP, in his official capacity
 22 as President of the United States of America;
 23 UNITED STATES OF AMERICA; LOUIS
 24 DEJOY, in his official capacity as Postmaster
 25 General; UNITED STATES POSTAL
 SERVICE,

26 Defendants.
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NO. 1:20-cv-03127-SAB

DEFENDANTS' UNOPPOSED
 MOTION FOR EXTENSION OF
 TIME TO RESPOND TO
 COMPLAINT

NOTING DATE: November 20, 2020
 Without Oral Argument

UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO COMPLAINT

Pursuant to Federal Rule of Civil Procedure 6(b), Defendants hereby move the Court to extend Defendants’ deadline for responding to Plaintiffs’ Complaint from November 25, 2020 to December 9, 2020. As the Court is aware, the Postal Service is currently a defendant in numerous lawsuits throughout the country related to its policies for the processing of election mail.¹ These lawsuits require the dedication of significant resources on multiple tasks, including additional discovery.² Additionally, counsel for Plaintiffs and counsel for Defendants are in the process of discussing next steps in this litigation in light of the fact that the November election has already taken place, but require additional time to discuss a plan for any future proceedings.

The requested extension will not prejudice Plaintiffs because the Court has already issued a preliminary injunction, and the November election has already taken place. Defendants have conferred with Plaintiffs, and Plaintiffs do not object to Defendants’ requested extension.

¹ See, e.g., *Pennsylvania v. DeJoy*, 20-cv-4096, ECF No. 63 (E.D. Pa. Sept. 28, 2020), as modified by ECF No. 70; *Jones v. USPS*, 20-cv-6516, ECF No. 57 (S.D.N.Y. Sept. 25, 2020), as modified by ECF No. 66.

² See, e.g., *Vote Forward v. DeJoy*, 20-cv-2405 (D.D.C.); *NAACP v. USPS*, 20-cv-2295 (D.D.C.).

1 Dated: November 20, 2020

Respectfully submitted,

2 JEFFREY BOSSERT CLARK
3 Acting Assistant Attorney General

4 ERIC R. WOMACK
5 Assistant Director, Federal Programs Branch

6 */s/ Joseph E. Borson*
7 JOSEPH E. BORSON (Va. Bar No. 85519)
8 KUNTAL CHOLERA
9 ALEXIS ECHOLS
10 DENA M. ROTH
11 Trial Attorneys
12 U.S. Department of Justice
13 Civil Division, Federal Programs Branch
14 1100 L. Street, NW
15 Washington D.C. 20005
16 (202) 514-1944
17 Joseph.Borson@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of November, I electronically filed the foregoing Motion for Extension of Time with the Clerk by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Dated: November 20, 2020

By: /s/ Joseph E. Borson
Joseph E. Borson

Counsel for Defendants