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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: December 7, 2020
 Without Oral Argument

1 **UNOPPOSED MOTION FOR EXTENSION OF TIME**
2 **TO RESPOND TO COMPLAINT**

3 Pursuant to Federal Rule of Civil Procedure 6(b), Defendants hereby move the
4 Court to extend Defendants’ deadline for responding to Plaintiffs’ Complaint from
5 December 9, 2020 to January 15, 2021. As the Court is aware, the Postal Service is
6 currently a defendant in numerous lawsuits throughout the country related to its
7 policies for the processing of election mail. These lawsuits require the dedication of
8 significant resources on multiple tasks, and the Postal Service is currently involved
9 in an expedited discovery process in two of these lawsuits.¹ Additionally, counsel
10 for Plaintiffs and counsel for Defendants are in the process of discussing next steps
11 in this litigation given that the November election has already taken place.

12 Providing Defendants with additional time to respond to Plaintiffs’ Complaint will
13 allow the parties to complete discussions concerning what other proceedings, if any,
14 may be necessary.

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

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26 ¹ See, e.g., *Pennsylvania v. DeJoy*, 20-cv-4096, ECF No. 63 (E.D. Pa. Sept. 28, 2020), as modified
27 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.

1 Dated: December 7, 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*
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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of December, I electronically filed the foregoing Unopposed Motion for Extension of Time to Respond to Complaint 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: December 7, 2020

By: /s/ Alexis J. Echols
Alexis J. Echols
Counsel for Defendants