

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

STATE OF NEW YORK, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Defendants.

Civil Docket No. 20-cv-2340 (EGS)

DEFENDANTS' 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 answering or moving to dismiss Plaintiffs' Complaint by 36 days, from November 9, 2020 to December 15, 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. These litigations require the dedication of significant resources on multiple tasks, including the implementation of multiple preliminary injunction provisions that include periodic reporting requirements.¹ This Court has also ordered daily reporting and held daily status conferences in *Vote Forward v. DeJoy*, No. 20-cv-2405 (D.D.C.), *NAACP v. United States Postal Service*, No. 20-cv-2295 (D.D.C.), and *Richardson v. Trump*, No. 20-cv-2262

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; *Washington v. Trump*, 20-cv-3127, ECF No. 81 (E.D. Wash. Sept. 17, 2020), as modified by ECF No. 90.

(D.D.C). In this case, the Court has granted plaintiffs' motion for expedited briefing on Plaintiffs' motion and Defendants' cross-motion for summary judgment, both of which are now fully briefed.

The requested extension will not prejudice Plaintiffs because the Court has already issued a preliminary injunction governing Defendants' handling of election mail, and the parties' cross-motions for summary judgment are fully briefed. Defendants have conferred with Plaintiffs, and Plaintiffs do not object to Defendants' requested extension.

Dated: November 4, 2020

Respectfully submitted,

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