

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

[REDACTED]
[REDACTED],

Plaintiff,

v.

GREGORY A. RICHARDSON,
Director, Texas Service Center,
U.S. Citizenship and Immigration
Services,

Defendant.

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CIVIL ACTION FILE

NO. [REDACTED]

**DEFENDANT’S UNOPPOSED MOTION FOR ENLARGEMENT
OF TIME AND SUPPORTING MEMORANDUM**

COMES NOW Defendant Gregory Richardson, Director of the Texas Service Center, United States Citizenship Immigration Services (“CIS”) (“Defendant”) in this case, by and through Byung J. Pak, United States Attorney for the Northern District of Georgia, to respectfully move this Court for an order granting the Defendant an enlargement of time until November 30, 2020, to answer or otherwise respond to the Complaint filed in this case. *See* Doc 5.¹ In support of this motion, the Defendant states as follows:

¹ “Doc. ___” refers to the number assigned to the documents listed on the District Court’s docket sheet in this case, and the pages within those documents.

Plaintiff [REDACTED] (“Plaintiff”) filed this lawsuit pursuant to the Administrative Procedure Act to compel Defendant to reopen his daughter’s Form I-765 employment authorization application and adjudicate it. Doc 5 at 1. CIS (Texas Service Center (“TSC”)) recently reopened the application for further consideration, and issued a request for evidence (“RFE”), which gives Plaintiff until November 9, 2020 to respond. CIS/TSC requests the extension of time in order to receive a response to the RFE by November 9, 2020, complete its review, and adjudicate the petition. Accordingly, Defendant requests an extension until November 30, 2020, to answer or otherwise respond to the Complaint.

Counsel for Defendant conferred with Plaintiff’s counsel about the extension who has no objections to the relief requested by this motion. A proposed order consistent with the requested relief is provided for the Court’s convenience.

WHEREFORE, Defendant respectfully requests an extension of time until November 30, 2020, to allow CIS/TSC to answer or otherwise respond to the complaint.

Respectfully submitted this 28th day of August, 2020.

BYUNG J. PAK
UNITED STATES ATTORNEY

S/Melaine A. Williams

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U.S. Citizenship and Immigration Services
U.S. Dept. of Homeland Security

CERTIFICATE OF COMPLIANCE

I certify that the documents to which this certificate is attached have been prepared with one of the font and point selections approved by the Court in Local Rule 5.1B for documents prepared by computer.

S/Melaine A. Williams

MELAINE A. WILLIAMS
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I certify that on August 28, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the following counsel of record:

Willis Miller

This 28th day of August, 2020

S/Melaine A. Williams

MELAINE A. WILLIAMS
Assistant U.S. Attorney