

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS**

ARGHAVAN LOUHGHALAM, et al.,)	
)	
Petitioners/Plaintiffs,)	
)	
v.)	Case No. 1:17-cv-10154
)	
DONALD TRUMP, President of the)	
United States, et al.,)	
)	
Respondents/Defendants.)	

**MOTION FOR EXTENSION OF TIME TO FILE OPPOSITION
TO CONTINUATION OF TEMPORARY RESTRAINING ORDER**

Respondents/Defendants (“Defendants” or “the Government”), by and through counsel, hereby move for an extension of time under Fed. R. Civ. P. 6(b) to file an opposition to the continuation of the Temporary Restraining Order entered on January 29, 2017 until 12:00 a.m. on February 3, 2017. Defendants state that good cause for such an extension exists:

1. On January 29, 2017, the Court issued a Temporary Restraining Order (“TRO”), which is set to expire on February 5, 2017 (ECF No. 6).
2. On February 1, 2017, after an assented-to extension of time, Petitioners/Plaintiffs (“Plaintiffs”) filed an amended complaint (ECF No. 28).
3. Also on February 1, 2017, this Court directed Defendants, if they intend to oppose the continuation of the TRO, to file a written response on or before 12:00 noon today, February 2, 2017 (ECF No. 36).
4. Defendants are diligently working on a thorough opposition to continuation of the TRO, but request a brief extension of time, until 12:00 a.m. on February 3, 2017, to file their opposition.

5. Additional time to submit the opposition is required in order for the Government to fully brief its opposition to the TRO, particularly in light of the substantial internal review necessary to address issues of national significance and the fact that Plaintiffs have recently amended their Complaint to include significantly changed allegations and causes of action.
6. Defendants conferred with Plaintiffs, who indicated that they would not assent to the request for an extension of time. Defendants are still conferring with Plaintiffs, however, as to whether the parties can resolve any issues relating to the status of the TRO.
7. The extension is not being sought in bad faith or for purposes of delay.

For the foregoing reasons, Defendants respectfully request an extension of time to file an opposition to the continuation of the TRO until 12:00 a.m. on February 3, 2017.

February 2, 2017

Respectfully Submitted,

CHAD A. READLER
Acting Assistant Attorney General
Civil Division

WILLIAM C. PEACHEY
Director, Office of Immigration Litigation
District Court Section

GISELA A. WESTWATER
Senior Litigation Counsel
Office of Immigration Litigation
District Court Section

By: s/ Katherine J. Shinnors
KATHERINE J. SHINNERS
DC Bar No. 978141
Trial Attorney
U.S. Department of Justice, Civil Division
Office of Immigration Litigation
District Court Section
P.O. Box 868, Ben Franklin Station

Washington, DC 20044
Telephone: (202) 598-8259
Fax: (202) 305-7000
katherine.j.shinners@usdoj.gov

JOSHUA S. PRESS
Trial Attorney
United States Department of Justice
Civil Division
Office of Immigration Litigation
P.O. Box 868, Ben Franklin Station
Washington, DC 20044
Phone: (202) 305-0106
Facsimile: (202) 305-7000
e-Mail: joshua.press@usdoj.gov

WILLIAM D. WEINREB,
Acting U.S. Attorney
District of Massachusetts

RAYFORD A. FARQUHAR
BBO No. 560350
U.S. Attorney's Office
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3284
rayford.farquhar@usdoj.gov

MICHAEL SADY
BBO No. 552934
U.S. Attorney's Office
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3362
michael.sady@usdoj.gov

Counsel for Respondents/Defendants

CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2017, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the District of Massachusetts 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.

By: s/ Katherine J. Shinnors
KATHERINE J. SHINNERS
DC Bar No. 978141
Trial Attorney
U.S. Department of Justice, Civil Division
Office of Immigration Litigation
District Court Section