

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

UNITED STATES OF AMERICA,

PLAINTIFF,

v.

THE STATE OF TEXAS; GREG ABBOTT IN HIS OFFICIAL CAPACITY AS GOVERNOR OF TEXAS; TEXAS DEPARTMENT OF PUBLIC SAFETY; STEVEN C. McCRAW, IN HIS OFFICIAL CAPACITY AS DIRECTOR OF TEXAS DEPARTMENT OF PUBLIC SAFETY,

DEFENDANTS.

CASE No. 1:24-cv-00008-DAE (LEAD CASE)

CONSOLIDATED WITH 1:23-cv-1537-DAE

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO *LAS AMERICAS* PLAINTIFFS' COMPLAINT**

Defendants Steven C. McCraw, in his official capacity as Director of Texas Department of Public Safety; and Bill D. Hicks, in his official capacity as District Attorney for the 34th Judicial District of Texas, respectfully request a thirty-day extension to respond to the Complaint of Plaintiffs Las Americas Immigrant Advocacy Center, American Gateways, and the County of El Paso in Case No. 1:23-cv-1537, which would otherwise be due April 1, 2024 (per Text Order entered on January 22, 2024 in Case No. 1:23-cv-1537). Defendants have conferred with Plaintiffs concerning this motion, and it is unopposed.

Good cause exists for an extension. Currently, the grant of a preliminary injunction by this Court has been appealed, with proceedings currently ongoing in the U.S. Court of Appeals for the Fifth Circuit. ECF No. 49. Accordingly, extending the time for Defendants to respond to the Plaintiffs' Complaint by thirty days will conserve the parties' and the Court's resources. A proposed order is attached.

Date: March 19, 2024

Respectfully submitted.

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CERTIFICATE OF CONFERENCE

I certify that I conferred via e-mail with Cody Wofsy, counsel for Plaintiffs, Las Americas Immigrant Advocacy Center, American Gateways, and the County of El Paso, on March 12, 2024, who indicated that Plaintiffs Las Americas Immigrant Advocacy Center, American Gateways, and the County of El Paso are unopposed to this motion.

/s/ Ryan D. Walters
RYAN D. WALTERS

CERTIFICATE OF SERVICE

On March 19, 2024, this document was filed electronically through the Court's CM/ECF system, which automatically serves all counsel of record.

/s/ Ryan D. Walters
RYAN D. WALTERS