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 7 *Sanders, Provost, Karisch, U.S. Dept. of*
 8 *Homeland Security, U.S. Customs and*
Border Protection, and the United States

9
 10 **UNITED STATES DISTRICT COURT**
 11 **DISTRICT OF ARIZONA**

13 Terrence Bressi,
 14 Plaintiff,
 15 v.
 16 Pima County Sheriff Mark Napier, et al.
 17 Defendants.

No. CV-18-186-TUC-DCB
**FEDERAL DEFENDANTS’
 MOTION FOR EXTENSION OF
 TIME TO RESPOND TO SECOND
 AMENDED COMPLAINT**
(First Request)

19 The Federal Defendants—Defendants McAleenan, Sanders, Provost, Karisch, U.S.
 20 Department of Homeland Security, U.S. Customs and Border Patrol, and the United
 21 States—following LRCiv 7.3, respectfully request that this Court extend the deadline to
 22 respond to Terrence Bressi’s Second Amended Complaint (Doc. 42) until September 30,
 23 2019.

24 Good cause exists to extend the deadline. *See* Fed. R. Civ. P. 16(b)(4) (stating that a
 25 deadline may be modified for “good cause”). Because of the nature of Bressi’s claims, the
 26 local U.S. Attorney’s Office must coordinate with government officials in multiple
 27 agencies from across the country. This office has begun coordinating those agencies, but
 28 still has not received all of the materials needed to evaluate and adequately respond to

1 Bressi's complaint. For those reasons, the Federal Defendants respectfully request that the
2 Court extend their deadline to respond Bressi's amended complaint to September 30,
3 2019.

4 The Federal Defendants have contacted Bressi's attorney as well as the attorney for
5 the Pima County Defendants. Neither opposes the extension. *See* LRCiv 7.3(b).

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7 Respectfully submitted on September 11, 2019.

8 MICHAEL BAILEY
9 United States Attorney
District of Arizona

10
11 By *s/ Dennis C. Bastron*
12 DENNIS C. BASTRON
Assistant U.S. Attorney
13 *Attorney for Respondent*

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15 **CERTIFICATE OF SERVICE**

16 I hereby certify that on September 11, 2019, I electronically transmitted the attached
17 document to the Clerk's Office using the CM/ECF System for filing. Additionally, I
18 served the attached document by U.S. mail on the following, who are not registered
19 participants of the CM/ECF System:

20 Ralph E. Ellinwood
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22 *Attorney for Plaintiff*

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25 *Attorney for the Pima County Defendants*

26 By *s/ Dennis C. Bastron*
27
28