UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF FLORIDA PENSACOLA DIVISION

STATE OF FLORIDA,))
Plaintiff,))
V.)
ALEJANDO MAYORKAS,)
Defendants.)

Civil Action No. 3:23-cv-09962

REQUEST FOR EXTENSION AND NOTICE

)

Defendants are in receipt of Plaintiffs' complaint and motion for temporary restraining order, ECF Nos. 1, 2. The Complaint alleges the government has implemented a "new policy" concerning releases at the southern border. ECF 1, \P 8. The government has this morning, after conferring with Plaintiffs, shared this policy with Plaintiffs, and it is also attached to this filing. *See* Ex. 1, "Policy on Parole with Conditions in Limited Circumstances Prior to the Issuance of a Charging Document (Parole with Conditions)." That policy went into effect May 10, 2023, and is currently operative. *Id*.

The government is in receipt of the Court's order to file a response by 4 p.m. eastern today. To allow the government to submit a responsive pleading and appropriate declaration in support of its response, the government respectfully requests it be allowed until 2 P.M. eastern, Friday Mary 12, to file its submission.

Date: May 11, 2023

Respectfully submitted,

JASON R. CODY Acting United States Attorney

MARIE A. MOYLE Assistant United States Attorney Northern District of Florida BRIAN M. BOYNTON Principal Deputy Assistant Attorney General

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

EREZ REUVENI Assistant Director

<u>/s/ Joseph A. Darrow</u> JOSEPH A. DARROW *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 Tel.: (202) 805-7537 Joseph.a.darrow@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on May 11, 2023, I electronically filed the foregoing document with the Clerk of the Court for the United States Court of for the Northern District of Florida by using the CM/ECF system. Counsel in the case are registered CM/ECF users and service will be accomplished by the CM/ECF system.

By: /s/ Joseph A. Darrow JOSEPH A. DARROW Trial Attorney United States Department of Justice Civil Division