

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

NEANG CHEA TAING,)	
)	
Plaintiff,)	Civil Action No. 07-10499 WGY
)	
v.)	
)	
ALBERTO GONZALES, Attorney General)	
of the United States, <u>et al.</u> ,)	
)	
Defendants.)	
)	

**ASSENTED-TO MOTION FOR FURTHER EXTENSION OF TIME
TO FILE ANSWER OR OTHER RESPONSIVE PLEADING**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, defendants Alberto Gonzales, Attorney General of the United States; Michael Chertoff, Secretary of the U.S. Department of Homeland Security; Emilio T. Gonzales, Director, U.S. Citizenship and Immigration Services (“USCIS”); Denis Riordan, District Director, USCIS, hereby move for a further extension of time of 28 days, or until July 12, 2007, in which to answer or otherwise respond to plaintiff’s complaint. Counsel for the plaintiff has assented to this motion. In further support of this motion, defendants say as follows:

1. On March 14, 2007, plaintiff Neang Chea Taing filed a Petition for Writ of Mandamus and Complaint for Declaratory and Injunctive Relief on Behalf of Surviving Spouse of a United States Citizen.

2. On May 17, 2007, defendants moved for an extension of time of 28 days, or until June 14, 2007, in which to file an answer or other responsive pleading, which was allowed by this Court.

3. Defendants are consulting with the U.S. Citizenship and Immigration Services and the Office of Immigration Litigation, U.S. Department of Justice, regarding the government's position in this case. The parties are in agreement that it is in the interests of justice, and would further the potential resolution of this action without the need for this Court's intervention, for those consultations to conclude before the government files a responsive pleading in this case.

4. On June 14, 2007, undersigned counsel spoke with counsel for the plaintiff, Thomas Stylianos, Jr., Esq., regarding this motion, and Mr. Stylianos stated that he would assent to this motion.

WHEREFORE, with good cause having been shown, defendants respectfully request that this Court grant them a further extension of time of 28 days, or until July 12, 2007, in which to file an answer or otherwise respond to plaintiff's complaint.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Mark T. Quinlivan
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Dated: June 14, 2007

LOCAL RULE 7.1(a)(2) CERTIFICATE AND CERTIFICATE OF SERVICE

Pursuant to Local Rule 7.1(a)(2), I certify that, on June 14, 2007, I spoke with counsel for the plaintiff, Thomas Stylianos, Jr., Esq., regarding this motion, and that Mr. Stylianos stated that he would assent to this motion.

/s/ Mark T. Quinlivan
MARK T. QUINLIVAN
Assistant U.S. Attorney