

**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 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 an extension of time of 28 days, or until June 14, 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. Defendants’ answer or other responsive pleading is due on this date, May 17, 2007.

2. Undersigned counsel and counsel for the plaintiff have conferred about this case and have agreed that an extension of time of 28 days, or through June 14, 2007, would further the potential resolution of this action without the need for this Court's intervention.

WHEREFORE, with good cause having been shown, defendants respectfully request that this Court grant them an extension of time of 28 days, or until June 14, 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
MARK T. QUINLIVAN
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Dated: May 17, 2007

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

Pursuant to Local Rule 7.1(a)(2), I certify that, on May 17, 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