



U.S. Department of Justice

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Brooklyn, New York 11201*

March 6, 2020

Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Bing Guan, et al. v. Chad F. Wolf, et al.,*
Civil No. 19-CV-6570 (PKC/JO)

Dear Judge Chen:

The Court's February 28 minute order in the above-referenced case directed the parties to confer and submit a proposed briefing schedule by today with respect to the Government's forthcoming motion to dismiss the complaint. The parties jointly propose the following schedule:

The Government's motion to dismiss and supporting papers will be due April 6, 2020;
Plaintiffs' opposition to the Government's motion will be due May 13, 2020;
The Government's reply in support of its motion will be due June 3, 2020.

The parties have also discussed the length of the briefs to be filed. Because of the complex issues of constitutional law and federal jurisdiction that will need to be addressed, the parties jointly request that the Court grant each side a few extra pages. Specifically, the parties propose that they be allowed up to 30 pages (5 extra) for the initial and opposition briefs, and that the Government be given up to 12 pages (2 extra) on its reply brief.

We appreciate the Court's time and attention to this matter.

Respectfully submitted,

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United States Attorney

By: /s/ {FILED ELECTRONICALLY}
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cc: **By ECF & EMAIL**

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