

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

ANNUNCIATION HOUSE; ANGRY TIAS  
& ABUELAS OF THE RIO GRANDE  
VALLEY; JENNIFER HARBURY; and  
FIEL HOUSTON,

Consolidated Plaintiffs,

v.

THE STATE OF TEXAS and GREG  
ABBOTT, in his official capacity as  
Governor of the State of Texas,

Defendants,

STEVEN MCCRAW, in his official  
capacity as Director of the State of Texas  
Department of Public Safety,

Consolidated Defendant.

EP-21-cv-173-KC (Consolidated)

**JOINT MOTION FOR EXTENTION OF TIME TO  
FILE JOINT REPORT OF PARTIES' PLANNING MEETING**

Plaintiff the United States of America; Plaintiffs Annunciation House et al.; and Defendants the State of Texas, Steven McCraw, and Greg Abbott (collectively, the "Parties") respectfully request a 21-day extension of time to meet, confer, and file a joint report of the parties' planning meeting. That report is currently due on January 26, 2024. *See* Order dated Dec. 20, 2023, ECF No. 94. The Parties seek an extension of time until February 16, 2024 to meet, confer, and file the joint report.

Good cause supports this motion. The Parties have begun discussions concerning a potential resolution of this matter that would avoid the need for further litigation. Although the discussions are in the preliminary phase, the Parties intend to engage in further discussions in the coming days and weeks in an attempt to reach a resolution. Accordingly, the Parties respectfully request a 21-day extension of time to meet, confer, and file their joint report of the parties' planning meeting, so that they can focus on the discussions regarding a potential resolution. If the Parties reach a resolution, they will promptly inform the Court.

Accordingly, the Parties respectfully request their request for an extension of time be granted. A proposed Order is attached.

Date: January 25, 2024

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that a copy of this filing was served on the other parties to this action and their counsel of record through electronic filing in the Court's ECF system on January 25, 2024.

/s/ Michael J. Gerardi

Michael J. Gerardi