

June 26, 2018

VIA ECF

The Honorable George J. Hazel
United States District Court
District of Maryland
6500 Cherrywood Lane
Greenbelt, MD 20770

Re: *Kravitz et al. v. U.S. Dept. of Commerce et al.* (No. 18-cv-01041)

Dear Judge Hazel:

On behalf of the parties in the above-captioned action, we respectfully submit this joint letter to request an extension of the deadline for the parties' submission of letters addressing the availability and scope of discovery beyond the administrative record, **from June 26, 2018, to July 11, 2018.**

On June 8, 2018, Defendants produced the administrative record concerning the decision by the Secretary of Commerce to add a citizenship question to the 2020 Census. Plaintiffs filed their brief in opposition to Defendants' pending motion to dismiss under Fed. R. Civ. P. 12(b) on June 22, 2018. An extension of the June 26 deadline will enable the parties to meet and confer concerning discovery after fully reviewing the administrative record and to determine whether an agreement can be reached on the scope of additional discovery, if any. Given their respective schedules and caseloads, the parties believe that July 11 would be a more manageable deadline.

We trust that the parties' submission of the above letters to the Court on July 11 will allow sufficient time for the Court to review those submissions prior to the hearing scheduled for July 18, 2018. The parties have agreed that their letter-briefs to the Court on the discovery issue shall not exceed six single-spaced pages.

The parties will be prepared to address the discovery issues on July 18, in conjunction with argument on Defendants' motion to dismiss. If the Court requires more time to review the parties' discovery letters than a July 11 deadline would allow, the parties respectfully request that the Court grant a shorter adjournment and set an earlier deadline for these submissions on or after July 6, 2018.

Respectfully submitted,

Shankar Duraiswamy*
Dustin Cho*
Daniel Grant (Bar Number 19659)
Bianca Nunes*
Tina M. Thomas*
Karun Tilak*

Chad A. Readler
Acting Assistant Attorney General

Carlotta P. Wells
Assistant Branch Director

COVINGTON & BURLING LLP

Kate Bailey

COVINGTON

The Honorable George J. Hazel
June 26, 2018
Page 2

One CityCenter
850 Tenth Street, NW
Washington, D.C. 20001-4956
Tel: (202) 662-6000
Fax: (202) 662-6302
sduraiswamy@cov.com
dgrant@cov.com
bnunes@cov.com
tthomas@cov.com
ktilak@cov.com

P. Benjamin Duke*

COVINGTON & BURLING LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018-1405
Tel: (212) 841-1000
Fax: (212) 841-1010
pbduke@cov.com

Attorneys for Plaintiffs

*Admitted pro hac vice

Stephen Ehrlich
Carol Federighi
Trial Attorneys
United States Department of Justice
Civil Division, Federal Programs Branch
P.O. Box 883
Washington, DC 20044
Tel.: (202) 514-1903
carol.federighi@usdoj.gov

Attorneys for Defendants