UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CONFEDERATED TRIBES OF THE CHEHALIS RESERVATION et al., Plaintiffs, v. STEVEN MNUCHIN, in his official capacity as Secretary of the Treasury, Defendant.	Case No. 1:20-cv-1002-APM

MOTION FOR EXTENSION OF TIME

Defendant regrets the late nature of this filing, but the Parties have been conferring on a path forward in an attempt to reach agreement. By minute order dated April 20, 2020, the Court set the following deadlines for briefing Plaintiffs' Motion for Temporary Restraining Order and Preliminary Injunction (ECF No. 3):

- Defendant's Opposition: **April 22, 2020 by 5:00 p.m.**;
- Plaintiffs' Reply brief, if any: **April 23, 2020 by 12:00 p.m.**; and
- Hearing on Motion: **April 23, 2020 at 3:00 p.m**.

Defendant hereby moves the Court for an extension of those deadlines. Defendant represents that it has not yet arrived at a final decision on the question whether Alaska native corporations qualify as "Tribal governments" under Title V of the CARES Act, Pub. L. 116-136, codified as Subchapter VI of the Social Security Act, at 42 U.S.C. § 801. Defendant further represents that no payment has yet been made to Tribal governments from the Coronavirus Relief Fund and that such payments will be made no sooner than Tuesday, April 28, 2020. The delay in payment is occasioned, in part, on issues arising from certain of the funding submissions made to Treasury that are unrelated to this case and that must be resolved before payments can issue.

Wherefore, Defendant respectfully requests that the Court extend the deadlines as follows:

- Defendant's Opposition: **April 24, 2020 by 5:00 p.m.**;
- Plaintiffs' Reply brief, if any: **April 26, 2020 by 12:00 p.m.**; and
- Hearing on Motion: **April 27, 2020** at a time convenient for the Court.

Defendant continues to work with dispatch to arrive at a final decision, and intends to do so before any response is filed to Plaintiffs' Motion. Defendant has conferred with Plaintiffs, who do not consent to these dates because they are "concerned about Defendant's ability to disburse funds to Tribal governments after the statutory deadline."

Plaintiffs would consent, however, to a briefer extension if acceptable to the Court. Wherefore, Defendant asks in the alternative that the Court set the following deadlines, to which Plaintiffs consent:

- Defendant's Opposition: **April 23, 2020 by 5:00 p.m.**;
- Plaintiffs' Reply brief, if any: **April 24, 2020 by 12:00 p.m.**; and
- Hearing on Motion: **April 24, 2020** at a time convenient for the Court.

Dated: April 22, 2020

Respectfully submitted,

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