

No. 20-3837

**IN THE UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT**

KNIGHT FIRST AMENDMENT INSTITUTE AT
COLUMBIA UNIVERSITY,

Plaintiff-Appellee,

v.

UNITED STATES CITIZENSHIP AND IMMIGRATION
SERVICES, UNITED STATES DEPARTMENT OF
STATE, UNITED STATES IMMIGRATION AND
CUSTOMS ENFORCEMENT,

Defendants-Appellants,

UNITED STATES DEPARTMENT OF HOMELAND
SECURITY, UNITED STATES DEPARTMENT OF
JUSTICE, UNITED STATES CUSTOMS AND BORDER
PROTECTION,

Defendants.

On appeal from the United States District Court
for the Southern District of New York
No. 1:17-cv-7572 (Carter, J.)

**CONSENT MOTION TO EXTEND THE TIME TO FILE
APPELLEE'S BRIEF**

Pursuant to Federal Rule of Appellate Procedure 27 and Local Rule 27.1, Appellee Knight First Amendment Institute at Columbia University (the “Knight Institute”) seeks an extension of time to file its brief in this matter.

The Knight Institute’s brief is currently due on May 5, 2021. The Knight Institute seeks a two-week extension of time, until May 19, 2021, to file its brief. The Knight Institute consulted with Appellants, who consent to this request.

There are extraordinary circumstances that justify this request. Local Rule 27.1. Specifically, over the past week-and-a-half, two immediate family members of counsel with significant responsibility for preparation of the brief were diagnosed with Covid-19. This has required counsel to take on significant care responsibilities for sick family members and minor children who are required to quarantine for two weeks. As a result of the quarantine, the children cannot attend school or be cared for by anyone outside of immediate family.

The Knight Institute has not sought any prior extensions in this matter, and has requested this extension as soon as practicable. Additionally, this extension would result in the Knight Institute’s brief

being filed 86 days after the filing of Appellant's opening brief, which is within the time permitted by Local Rule 31.2(a)(1)(B).

April 28, 2021

/s/ Catherine Crump
Catherine Crump
Samuelson Law, Technology &
Public Policy Clinic
433 Law Building, UC Berkeley
School of Law
Berkeley, CA 94720
ccrump@clinical.law.berkeley.edu
(510) 642-5049

CERTIFICATE OF SERVICE

I hereby certify that on April 28, 2021, I electronically filed the foregoing motion with the Clerk of the Court for the United States Court of Appeals for the Second Circuit by using the appellate CM/ECF system. Participants in the case are registered CM/ECF users, and service will be accomplished by the appellate CM/ECF system.

/s/ Catherine Crump
Catherine Crump