UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

STATE OF CALIFORNIA, *et al.*, Plaintiffs, v. UNITED STATES POSTAL SERVICE, *et al.*, Defendants.	Case No. 1:26-cv-13917-IT

UNOPPOSED MOTION FOR 7-DAY EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFFS' COMPLAINT

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Federal Defendants respectfully request a 7-day extension of time, from November 16, 2026, to November 23, 2026, to answer or otherwise respond to Plaintiffs' complaint. As good cause for this request, which Plaintiffs do not oppose, Federal Defendants offer the following:

1. The complaint in this case challenges a Final Rule issued by the United States Postal Service. *See Ballot Mail for Federal Elections*, 91 Fed. Reg. 54,996 (Aug. 26, 2026).

2. That Final Rule is now enjoined in whole or in part in five different cases—two before this Court, and three in the District of Columbia. *League of Women Voters v. Massachusetts*, No. 26-cv-11549-IT, 2026 WL 2620871 (D. Mass. Sep. 4, 2026); *California v. USPS*, No. 26-cv-13917-IT, 2026 WL 2620871 (D. Mass. Sep. 4, 2026); *DSCC v. Trump*, No. 26-cv-01114-CJN, 2026 WL 2681471 (D.D.C. Sep. 13, 2026); *LULAC v. Exec. Off. of the President*, No. 26-cv-01132-CJN, 2026 WL 2681471 (D.D.C. Sep. 13, 2026); *NAACP v. Trump*, No. 26-cv-01151-CJN, 2026 WL 2681471 (D.D.C. Sep. 13, 2026).

3. In the two cases before this Court, Federal Defendants sought relief from the United States Court of Appeals for the First Circuit and the Supreme Court of the United States. The Supreme Court denied Defendants' stay motion on September 14, 2026. *USPS v. California*, No. 26A305, 2026 WL 2687160 (Mem.) (U.S. Sep. 14, 2026).

4. In the three cases in the District of Columbia—in which the district court's preliminary injunction applies both to the 2026 elections and to future elections—the deadline for any appeal was November 12, 2026. *See* Fed. R. App. P. 4(a)(1)(B). Federal Defendants did not appeal that preliminary junction.

5. Defendants' deadline to answer or otherwise respond to the complaint in this case is November 16, 2026, after the Court granted Defendants' previous unopposed motion for an extension. Fed. R. Civ. P. 12(a)(2); ECF No. 178.

6. In recent weeks, the parties have been discussing the future of this litigation and, to the extent necessary, a schedule for further proceedings. Those conversations have been productive, but Defendants require additional time for internal discussions on those subjects.

7. In addition, undersigned counsel for Federal Defendants currently faces several other significant and time-sensitive litigation deadlines in other matters.

8. Accordingly, Federal Defendants respectfully request a 7-day extension of time to answer or otherwise respond to Plaintiffs' complaint in this matter. The additional time is necessary for the parties to continue their discussions about further proceedings in this case, and to accommodate counsel's other deadlines.

9. Plaintiffs will suffer no prejudice in the interim, as they remain protected by overlapping injunctions in this case and four others—including in the District of Columbia litigation in which Federal Defendants have not appealed.

10. For these reasons, Federal Defendants respectfully request a 7-day extension of time to answer or otherwise respond to Plaintiffs' complaint.

11. Before filing this motion, counsel for Defendants conferred with counsel for Plaintiffs. Plaintiffs stated that they do not oppose the relief requested in this motion in light of Defendants' representations about Defendants' internal discussions, but that Plaintiffs anticipate opposing any further such requests absent tangible progress in the parties' discussions. Defendants hereby waive any argument that Plaintiffs have at all delayed the prosecution of this litigation through their non-opposition to Defendants' extension requests.

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Dated: November 13, 2026

Respectfully submitted,

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/s/ Stephen M. Pezzi
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LOCAL RULE 7.1(a)(2) CERTIFICATION

I hereby certify that on November 13, 2026, counsel for Defendants conferred via videoconference and e-mail with the following counsel (among others) for Plaintiffs and provided advance notice of this motion:

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The above counsel confirmed that Plaintiffs do not oppose the relief requested in this motion with the caveats set forth above.

/s/ *Stephen M. Pezzi*
STEPHEN M. PEZZI