

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**Zhimeng Zhang,**

**Plaintiff,**

**v.**

**Kristi Noem, Secretary, Department  
of Homeland Security, et al.,**

**Defendants.**

**No. 2:25-cv-07359**

**STIPULATION AND ORDER TO EXTEND TIME  
FOR DEFENDANTS TO ANSWER OR  
OTHERWISE RESPOND TO THE COMPLAINT**

It is hereby stipulated by the undersigned, subject to the Court's approval, as follows:

1. On January 14, 2026, the United States Attorney's Office accepted service of Plaintiff Zhimeng Zhang's Complaint, filed on December 24, 2025.
2. The Complaint (ECF No. 1) raises a *mandamus* action related to adjudication of Zhang's Application to Register for Permanent Residence or Adjust Status (I-485) and Refugee/Asylee Relative Petitions (I-730) for Lei Li and Chenshuo Zhang.
3. The government's response to the Complaint is currently due on March 16, 2026.
4. The United States Citizenship and Immigration Services ("USCIS") is actively evaluating these petitions.
5. As to the Refugee/Asylee Relative Petitions, USCIS has determined that additional evidence is needed for the agency to issue a final adjudication. Thus, on

January 28, 2026, USCIS issued Requests for Evidence (“RFEs”) to Lei Li and Chenshuo Zhang requesting this additional information. The petitioners have until May 8, 2026, to respond to the RFEs.

6. As to Zhang’s Application to Register for Permanent Residence or Adjust Status, on March 11, 2026, USCIS sent Zhang a request to appear for an interview on April 15, 2026 at 10:00 a.m. at 30 North 41<sup>st</sup> Street, Philadelphia, PA 19104.

7. The parties respectfully request that the government’s time to answer or otherwise respond to the Complaint be extended until August 10, 2026, to allow time for Zhang’s interview, the submission of RFE responses, and agency adjudication.

8. A grant of this extension request would conserve judicial resources. Absent exceptional or unforeseen circumstances (and assuming the interview proceeds as scheduled and the RFE responses are submitted on time) USCIS anticipates issuing final adjudications by August 10, 2026. It is thus the parties’ intention that this matter resolves, and becomes moot, without this Honorable Court’s intervention.

9. Pursuant to Federal Rule of Civil Procedure 6(b)(1)(a), this request has been made before the government’s time to respond to the Complaint has expired and good cause exists to extend the deadline for the government to respond to the Complaint.

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Dated: March 13, 2026

Respectfully submitted,

DAVID METCALF  
United States Attorney

/s/ Zhimeng Zhang  
*Plaintiff*  
with assistance of David Chien, Esq.  
Attorney assisting  
Zhang with his I-485 Application

/s/ Sarah T. Hansel  
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*Counsel for the Government*

**SO ORDERED:**

/s/ John R. Padova  
JOHN R. PADOVA  
Judge, United States District Court  
Date: March 13, 2026