

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

NANCY GIMENA HUI SHA-HUI SHA, on
behalf of herself and others similarly situated,

Plaintiffs,

v.

ALEJANDRO MAYORKAS, Secretary of
Homeland Security, et al.,

Defendants.

Civ. A. No. 21-100 (EGS)

**JOINT MOTION TO RESET BRIEFING SCHEDULE ON PLAINTIFFS' MOTIONS
FOR CLASS CERTIFICATION AND CLASSWIDE PRELIMINARY INJUNCTION**

Plaintiffs and Defendants, by and through undersigned counsel, jointly move the Court to vacate the current August 2, 2021 deadline for Plaintiffs' reply brief in support of their motions for class certification and preliminary injunction, and to instead adopt the proposed schedule set forth below to complete briefing on Plaintiffs' motions. As grounds for this motion, the parties state as follows:

1. Plaintiffs filed their motion for class certification on January 28, 2021 (ECF No. 23) and their motion for classwide preliminary injunction on February 5, 2021 (ECF No. 57). Defendants' filed their combined opposition to those motions on February 17, 2021 (ECF No. 76). The Court has since granted the parties' several joint motions to hold further briefing in abeyance in light of discussions exploring ways to resolve or narrow the dispute at issue in this case.

2. Most recently, the Court on July 19, 2021 issued a minute order granting the parties' July 16, 2021 joint motion to continue briefing in abeyance in light of those discussions, and reset the deadline for Plaintiffs' combined reply brief to August 2, 2021. That prior joint motion stated that "[t]he parties have agreed that either party may move to terminate the abeyance by filing a motion seeking such relief." ECF No. 111.

3. The parties' discussions attempting to resolve or narrow the dispute in this case have reached an impasse. The parties therefore seek to resume litigation on Plaintiffs' motions for class certification and classwide preliminary injunction.

4. The parties respectfully propose the following schedule for the completion of briefing on Plaintiffs' pending motions for class certification and classwide preliminary injunction:

- By August 2, 2021, Defendants shall file a supplemental declaration in support of their combined opposition to Plaintiffs' motions for class certification and classwide preliminary injunction;
- By August 11, 2021, Plaintiffs shall file their combined reply in support of their motions for class certification and classwide preliminary injunction.

5. A proposed order is enclosed.

Dated: August 2, 2021

Respectfully submitted,

CHANNING D. PHILLIPS
D.C. Bar #415793
Acting United States Attorney

BRIAN P. HUDAK
Acting Chief, Civil Division

/s/ Sean M. Tepe
SEAN M. TEPE, DC Bar #1001323
Assistant United States Attorney
555 Fourth St., N.W.
Washington, D.C. 20530
Phone: (202) 252-2533
Email: sean.tepe@usdoj.gov

Counsel for Defendants

/s/ Lee Gelernt
Lee Gelernt
Daniel A. Galindo**
Omar Jadwat**
Ming Cheung**
David Chen

American Civil Liberties Union Foundation,
Immigrants' Rights Project
125 Broad Street, 18th Floor
New York, NY 10004
Tel: (212) 549-2600

Attorneys for Plaintiffs
***Admitted pro hac vice*

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Defendants.

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[PROPOSED] ORDER

Upon consideration of the Joint Motion to Reset the Briefing Schedule on Plaintiffs' Motions for Class Certification and Classwide Preliminary Injunction and for good cause shown, it is hereby **ORDERED** that the Joint Motion is **GRANTED**.

It is **FURTHER ORDERED** that Defendants shall file their supplemental declaration in support of their combined opposition to Plaintiffs' motions for class certification and classwide preliminary injunction on August 2, 2021; and that Plaintiffs' shall file their combined reply in support of those motions on August 11, 2021.

Date

Emmet G. Sullivan
United States District Judge