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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION

11 AMERICAN CIVIL LIBERTIES UNION OF) No. 4:21-cv-02632-DMR
12 NORTHERN CALIFORNIA, *et al.*,)
13 Plaintiffs,) **STIPULATION TO CONTINUE FURTHER**
14 v.) **CASE MANAGEMENT CONFERENCE;**
15 U.S. IMMIGRATION AND CUSTOMS) **ORDER (AS MODIFIED)**
16 ENFORCEMENT, *et al.*,)
17 Defendants.)

18 Plaintiffs American Civil Liberties Union of Northern California, Mijente Support Committee,
19 Just Futures Law, and Immigrant Defense Project (“Plaintiffs”) and defendants U.S. Immigration and
20 Customs Enforcement (“ICE”), U.S. Customs and Border Protection (“CBP”), and U.S. Department of
21 Homeland Security (“DHS”) (“Defendants”), by and through their undersigned counsel, hereby
22 STIPULATE and respectfully REQUEST that the Court continue the parties’ further case management
23 conference (“CMC”) set for September 29, 2021 at 1:30 p.m. by two (2) weeks, until **October 13, 2021**
24 **at 1:30 p.m.**, with the parties’ updated joint CMC statement due by October 6, 2021. This stipulation is
25 based on the following facts:

26 1. This action, filed on April 13, 2021 under the Freedom of Information Act (“FOIA”),
27 concerns one FOIA request Plaintiffs directed to Defendants, dated July 6, 2020. ECF No. 1 at 20-23.
28 As the parties previously reported to the Court, since the filing of the lawsuit, Defendants have answered

1 the complaint, the parties have met and conferred regarding the FOIA request and the collection and
2 processing of records, including by telephone and email, and Defendants have been working to respond
3 to the Request. *See* ECF No. 27.

4 2. The parties have met and conferred productively regarding several issues, and would like
5 to continue to meet and confer regarding at least two outstanding issues before the parties' further CMC
6 in an effort to narrow the issues before presenting them to the Court. Accordingly, the parties stipulate
7 and respectfully request that the Court continue the parties' further CMC by two (2) weeks, from
8 September 29, 2021 until October 13, 2021, so the parties can continue this process. The parties
9 respectfully submit that this is the most efficient manner to proceed and will conserve the parties' and
10 Court's resources.

11 SO STIPULATED.

12 Respectfully submitted,

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14 STEPHANIE M. HINDS
Acting United States Attorney

15 Dated: September 22, 2021

16 By: /s/ Savith Iyengar
17 SAVITH IYENGAR
Assistant United States Attorney
Attorney for Defendant

18 Dated: September 22, 2021

19 By: **/s/ Vasudha Talla
20 VASUDHA TALLA
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22 Attorneys for Plaintiff

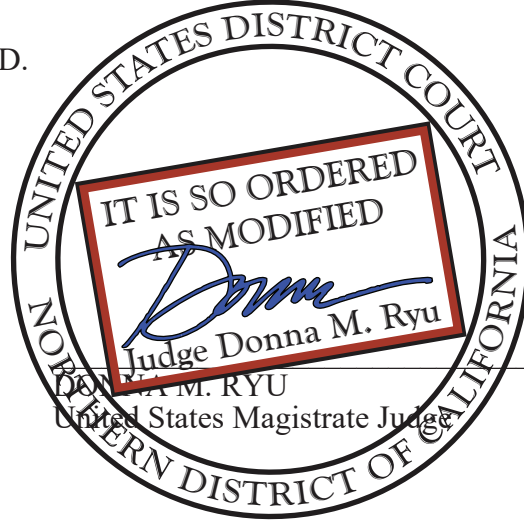
23 ** Pursuant to Civ. L.R. 5-1(i)(3), the filer of the document
24 has obtained approval from this signatory.
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ORDER (AS MODIFIED)

IT IS HEREBY ORDERED that the further Case Management Conference currently set for September 29, 2021 at 1:30 p.m. is continued to October 20, 2021 at 1:30 p.m. by Zoom video conference. The parties shall submit an updated joint case management conference statement by October 13, 2021.

IT IS SO ORDERED AS MODIFIED.

Dated: September 23, 2021



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