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9 Attorneys for Plaintiffs

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

| | | |
|---------------------------------|---|--------------------------------------|
| 13 THE CENTER FOR INVESTIGATIVE |) | CASE NO. 4:21-CV-09633-HSG |
| 14 REPORTING, et al., |) | |
| 15 Plaintiffs, |) | JOINT STIPULATION TO CONTINUE |
| 16 v. |) | CASE MANAGEMENT CONFERENCE; |
| 17 DEPARTMENT OF HOMELAND |) | ORDER |
| 18 SECURITY, |) | Date: April 19, 2022 |
| 19 Defendant. |) | Time: 2:00pm |
| |) | Location: Telephonically |

20 Plaintiffs The Center for Investigative Reporting and Ike Sriskandarajah (“Plaintiffs”) and
21 Defendant United States Department of Homeland Security, Immigration and Customs Enforcement
22 (“Defendant”) submit this stipulation pursuant to Civil Local Rule 6-2 to continue the case management
23 conference set for April 19, 2022 to May 17, 2022, or another subsequent date convenient to the Court.
24

25 This stipulation is based on the following facts:

- 26 1. This action, filed on December 14, 2021, arises out of a Freedom of Information Act
27 (“FOIA”) request submitted by Plaintiffs to Defendant. The parties have engaged in
28 cooperative and productive communications regarding the FOIA request and the search for

1 and release of responsive documents. Pursuant to the parties' agreed-upon production
2 schedule, ICE will make an initial production by April 14, 2022.

- 3 2. Lead counsel for Plaintiffs will be out of the country from April 11, 2022, until May 3, 2022.
- 4 3. Due to counsels' availability and to allow time for Plaintiffs to review the initial production
5 and for the parties to resolve as many issues as possible between themselves, the parties
6 stipulate and request that the Case Management Conference currently scheduled for April 19,
7 2022 be continued to May 17, 2022. The parties will provide the Court with a joint status
8 report by May 10, 2022. At that time, the parties may request a further continuance of the
9 Case Management Conference, or, if the need arises, request to appear at the Case
10 Management Conference.
- 11 4. The parties respectfully submit that this is the most efficient manner in which to proceed and
12 will conserve both the parties' and the Court's resources.

13
14
15 Respectfully submitted,

16 SHAWN MUSGRAVE
Attorney for Plaintiffs

17 Dated: March 31, 2022

18 By: /s/ Sapna Mehta
19 SAPNA MEHTA
Assistant United States Attorney
Attorney for Defendant

20
21 Dated: March 31, 2022

THE CENTER FOR INVESTIGATIVE REPORTING

22 By: /s/ Shawn Musgrave
23 D. VICTORIA BARANESTSKY
24 SHAWN MUSGRAVE
Attorneys for Plaintiffs

1 **ATTESTATION**

2 In compliance with Civil L.R. 5-1(h)(3), I attest that I have obtained concurrence in the filing of
3 this document from each of the other signatories.

4
5 Dated: March 31, 2022


By: /s/ Shawn Musgrave
SHAWN MUSGRAVE
Attorney for Plaintiffs

7 **ORDER BASED ON STIPULATION**

8
9 PURSUANT TO STIPULATION AND FOR GOOD CAUSE SHOWN, IT IS SO ORDERED.

10 The telephonic Case Management Conference currently set for April 19, 2022, is continued to
11 May 17, 2022, at 2:00 p.m. The Parties will file a joint status report by May 10, 2022.

12 DATED: 4/1/2022

13 
HONORABLE HAYWOOD S. GILLIAM, JR.
United States District Judge