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Attorneys for Defendants

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

11 AMERICAN CIVIL LIBERTIES UNION OF )  
12 NORTHERN CALIFORNIA, *et al.*, )

13 Plaintiffs, )

14 v. )

15 U.S. IMMIGRATION AND CUSTOMS )  
16 ENFORCEMENT, *et al.*, )

17 Defendants. )

No. 4:21-cv-02632-DMR

**STIPULATION TO CONTINUE FURTHER  
CASE MANAGEMENT CONFERENCE;  
ORDER (AS MODIFIED)**

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 May 4, 2022 at 1:30 p.m., ECF No. 42, by six (6) weeks, until **June 15,**  
24 **2022 at 1:30 p.m.**, with the parties’ updated joint CMC statement due by June 8, 2022. This stipulation  
25 is 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 Nos. 27, 35, 38, 41.

4       2. Defendants have continued working to respond to the Request and the parties have  
5 continued meeting and conferring productively. ICE continues to process at least 1,000 pages of  
6 potentially responsive records per month and file declarations regarding its process for determining  
7 duplicates that complies with the requirements of the Court’s amended civil conference minute order.  
8 *See* ECF No. 33; *see also* ECF No. 41. Defendants also continue to review and release, on an ongoing  
9 basis, the pages referred to or sent for consultation to DHS by other agencies. Finally, CBP continues to  
10 process non-email documents from the first tranche (program office documents) at a rate of 750 pages  
11 per month, in accordance with the parties’ agreement and this Court’s civil conference minute order.  
12 *See* ECF Nos. 41, 42.

13       3. The parties believe that additional time to complete this process and have further  
14 discussions, including about reducing the number of potentially responsive pages to be processed, would  
15 be helpful before presenting any remaining issues to the Court. Accordingly, the parties stipulate and  
16 respectfully request that the Court continue the parties’ further CMC by six (6) weeks, from May 4,  
17 2022 until June 15, 2022, so the parties can continue this process. The parties respectfully submit that  
18 this is the most efficient manner to proceed and will conserve the parties’ and Court’s resources.

19               SO STIPULATED.

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Respectfully submitted,

STEPHANIE M. HINDS  
United States Attorney

Dated: April 27, 2022

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

Dated: April 27, 2022

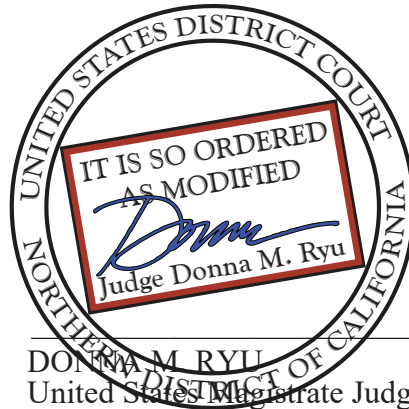
By: \*\*/s/ Vasudha Talla  
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Attorneys for Plaintiff

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

**ORDER (AS MODIFIED)**

IT IS HEREBY ORDERED that the further Case Management Conference currently set for  
May 4, 2022 at 1:30 p.m. is continued until June 29, 2022 at 1:30 p.m. in Oakland, by Videoconference  
only. The parties shall submit a joint case management conference statement by June 22, 2022.

Dated: April 27, 2022



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DONNA M. RYU  
United States Magistrate Judge