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1 2 3 4 5	STEPHANIE M. HINDS (CABN 154284) United States Attorney MICHELLE LO (NYRN 4325163) Chief, Civil Division SAPNA MEHTA (CABN 288238) Assistant United States Attorney 450 Golden Gate Avenue, Box 36055 San Francisco, California 94102-3495 Telephone: (415) 436-7478				
6	FAX: (415) 436-6748 sapna.mehta@usdoj.gov				
7	Attorneys for Defendant				
8					
9	NORTHERN DISTRICT OF CALIFORNIA				
10	OAKLAND DIVISION				
11					
12	THE CENTER FOR INVESTIGATIVE REPORTING, et al.,) CASE NO. 4:21-CV-09633-HSG			
13 14	Plaintiffs,	 STIPULATED REQUEST TO CONTINUE CASE MANAGEMENT CONFERENCE AND ORDER (as modified) 			
15 16	v. DEPARTMENT OF HOMELAND SECURITY,)) Date: May 17, 2022) Time: 2:00pm) Location: Telephonically			
17	Defendant.				
18)			
19	Plaintiffs The Center for Investigative Reporting and Ike Sriskandarajah ("Plaintiffs") and				
20	Defendant United States Department of Homeland Security, Immigration and Customs Enforcement				
21	("Defendant"), by and through their undersigned counsel, submit this stipulation pursuant to Local Civil				
22	Rule 6-2 to continue the case management conference set for May 17, 2022 to June 28, 2022, or a				
23	subsequent date convenient to the Court. This stipulation is based on the following facts:				
24	1. This action, filed on December 14, 2021, arises out of a Freedom of Information Act				
25	("FOIA") request submitted by Plaintiffs to Defendant. The parties have engaged in				
26	cooperative and productive communications regarding the FOIA request and the search				
27	for and release of responsive documents. ICE made an initial production on April 14,				
28	2022 and continues its review pursuant to the parties' agreed-upon processing schedule.				
	STIPULATED REQUEST TO CONTINUE CMC AND ORDER 4:21-CV-09633-HSG				

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2. To allow time for additional processing of documents, for Plaintiffs to review			
	productions, and for the parties to resolve as many issues in this matter as possible		
	between themselves, the parties stipulate and request that the case management		
	conference currently scheduled for May 17, 2022 be continued to June 28, 2022. The		
	parties will provide the Court with a joint status report by June 21, 2022. At that time,		
	the parties may request a further continuance of the case management conference, or, if		
	the need arises, request to appear at the case management conference.		
3.	The parties respectfully submit that this is the most efficient manner in which to proceed		
	and will conserve both the parties' and the Court's resources.		
			Respectfully submitted,
			STEPHANIE M. HINDS
			United States Attorney
Dated: May 9	, 2022	By:	<u>/s/ Sapna Mehta</u> SAPNA MEHTA
			Assistant United States Attorney Attorney for Defendant
Dated: May 9	, 2022		THE CENTER FOR INVESTIGATIVE REPORTING
		By:	/s/ Shawn Musgrave
		Dy.	D. VICTORIA BARANESTSKY
			SHAWN MUSGRAVE Attorneys for Plaintiffs
ATTESTATION			
In compliance with Civil L.R. 5-1(h)(3), I attest that I have obtained concurrence in the filing of			
this document from each of the other signatories.			
Dated: May 9	, 2022	By:	<u>/s/ Sapna Mehta</u> SAPNA MEHTA
			Assistant United States Attorney Attorney for Defendant
			-
STIPULATED REQUEST TO CONTINUE CMC AND ORDER 4:21-CV-09633-HSG			

ORDER

Pursuant to the stipulation of the parties, and good cause having been shown, it is hereby ordered that the telephonic case management conference currently set for May 17, 2022 is continued to June 28, 2022 at 2:00 p.m. The parties will file a joint status report by June 21, 2022.

IT IS SO ORDERED.

DATED: 5/10/2022

or S. Gill

THE HON. HAYWOOD S. GILLIAM, JR. United States District Judge