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

12 THE CENTER FOR INVESTIGATIVE
REPORTING, et al.,

13 Plaintiffs,

14 v.

15 DEPARTMENT OF HOMELAND
16 SECURITY,

17 Defendant.

) CASE NO. 4:21-CV-09633-HSG

) **STIPULATED REQUEST TO CONTINUE CASE**
) **MANAGEMENT CONFERENCE AND**
) **ORDER**

) Date: June 28, 2022

) Time: 2:00pm

) Location: Telephonically

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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 June 28, 2022 to August 9, 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 has made two productions and continues
28 its review pursuant to the parties’ agreed-upon processing schedule.

- 1 2. To allow time for additional processing of documents, for Plaintiffs to review
- 2 productions, and for the parties to resolve as many issues in this matter as possible
- 3 between themselves, the parties stipulate and request that the case management
- 4 conference currently scheduled for June 28, 2022 be continued to August 9, 2022. The
- 5 parties will provide the Court with a joint status report by August 2, 2022. At that time,
- 6 the parties may request a further continuance of the case management conference, or, if
- 7 the need arises, request to appear at the case management conference.
- 8 3. The parties respectfully submit that this is the most efficient manner in which to proceed
- 9 and will conserve both the parties' and the Court's resources.

Respectfully submitted,

STEPHANIE M. HINDS
United States Attorney

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13 Dated: June 15, 2022

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

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16 Dated: June 15, 2022

THE CENTER FOR INVESTIGATIVE REPORTING

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18 By: /s/ Shawn Musgrave
D. VICTORIA BARANESTSKY
SHAWN MUSGRAVE
Attorneys for Plaintiffs

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21 **ATTESTATION**

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

24
25 Dated: June 15, 2022


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

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 June 28, 2022 is continued to August 9, 2022 at 2:00 p.m. The parties will file a joint status report by August 2, 2022.

IT IS SO ORDERED.

DATED: 6/15/2022


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