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                                 UNITED STATES DISTRICT COURT
 9
                               NORTHERN DISTRICT OF CALIFORNIA
10
                                        OAKLAND DIVISION
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12
    THE CENTER FOR INVESTIGATIVE
                                                  CASE NO. 4:21-CV-09633-HSG
    REPORTING, et al.,
13
                                                  STIPULATED REQUEST TO CONTINUE CASE
           Plaintiffs,
                                                   MANAGEMENT CONFERENCE AND
14
                                                   ORDER
        v.
15
                                                  Date: August 9, 2022
                                                  Time: 2:00pm
    DEPARTMENT OF HOMELAND
                                                  Location: Telephonically
16
    SECURITY,
17
           Defendant.
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19
           Plaintiffs The Center for Investigative Reporting and Ike Sriskandarajah ("Plaintiffs") and
    Defendant United States Department of Homeland Security, Immigration and Customs Enforcement
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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 August 9, 2022 to September 20, 2022, or
23
    a subsequent date convenient to the Court. This stipulation is based on the following facts:
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           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 four productions and continues
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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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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			ties stipulate and request that the case management
4	conference currently schedu		schedul	ed for August 9, 2022 be continued to September 20, 2022.
5	The parties will provide the C			Court with a joint status report by September 13, 2022. At
6	that time, the parties may request a further continuance of the case management			quest a further continuance of the case management
7	7 conference, or, if the need arises, request to appear at the case management			ises, 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.			
10				Respectfully submitted,
11				STEPHANIE M. HINDS
12				United States Attorney
13	Dated: July 28, 2022 By:		By:	/s/ Sapna Mehta Sapna Mehta
14				Assistant United States Attorney Attorney for Defendant
15				Attorney for Defendant
16	Dated: July 28, 2022  By:			THE CENTER FOR INVESTIGATIVE REPORTING
17			D.,,	/s/ Shawn Musgrave
18			Бу.	D. VICTORIA BARANETSKY
19				SHAWN MUSGRAVE Attorneys for Plaintiffs
20				·
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: July 28	3, 2022	By:	/s/ Sapna Mehta SAPNA MEHTA
26				Assistant United States Attorney Attorney for Defendant
27				Thorney for Defendant
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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 August 9, 2022 is continued to September 20, 2022 at 2:00 p.m. The parties will file a joint status report by September 13, 2022.

IT IS SO ORDERED.

DATED: 7/28/2022

