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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: March 28, 2023

) Time: 2:00pm

) Location: Telephonically

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 March 28, 2023 to May 2, 2023, or a
23 subsequent date convenient to the Court. This stipulation is based on the following facts:

- 24 1. This action arises out of a Freedom of Information Act (“FOIA”) request submitted by
25 Plaintiffs to Defendant. The parties resolved all issues regarding the search for and
26 release of responsive documents in response to the FOIA request and have since been
27 conferring over Plaintiffs’ request for attorney’s fees. The parties need additional time to
28 continue those discussions to resolve as many issues in this matter as possible between

1 themselves. The parties thus stipulate and request that the case management conference
2 currently scheduled for March 28, 2023 be continued by one month to May 2, 2023. The
3 parties will provide the Court with a joint status report by April 25, 2023 if this matter
4 has not been resolved by that time. If resolution is reached before then, the parties will
5 file a stipulation of dismissal.

- 6 2. The parties respectfully submit that this is the most efficient manner in which to proceed
7 and will conserve both the parties' and the Court's resources.

8 Respectfully submitted,

9 STEPHANIE M. HINDS
10 United States Attorney

11 Dated: March 20, 2023

12 By: /s/ Sapna Mehta
13 SAPNA MEHTA
14 Assistant United States Attorney
15 Attorney for Defendant

16 Dated: March 20, 2023

17 THE CENTER FOR INVESTIGATIVE REPORTING

18 By: /s/ Victoria Baranetsky
19 D. VICTORIA BARANETSKY
20 Attorney for Plaintiffs

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 Dated: March 20, 2023


25 By: /s/ Sapna Mehta
26 SAPNA MEHTA
27 Assistant United States Attorney
28 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 March 28, 2023 is continued to May 2, 2023 at 2:00 p.m. The parties will file a joint status report by April 25, 2023.

IT IS SO ORDERED.

DATED: 3/20/2023


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