

1 ISMAIL J. RAMSEY (CABN 189820)
United States Attorney
2 MICHELLE LO (NYRN 4325163)
Chief, Civil Division
3 DAVID M. DEVITO (CABN 243695)
Assistant United States Attorney

4 450 Golden Gate Avenue, Box 36055
5 San Francisco, California 94102-3495
6 Telephone: (415) 436-7332
7 Facsimile: (415) 436-6748
E-mail: david.devito@usdoj.gov

8 Attorneys for Defendants

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

12 NATIONAL BAIL FUND NETWORK, et al.,)	Case No. 4:22-cv-07772-HSG
13 Plaintiffs,)	STIPULATION AND ORDER TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE (as modified)
14 v.)	
15 U.S. IMMIGRATION AND CUSTOMS 16 ENFORCEMENT, et al.,)	
17 Defendants.)	
18)	

19 Pursuant to Civ. L.R. 6-2 and 7-12, the Parties, through undersigned counsel, submit the
20 following stipulation and request to continue the initial case management conference and associated
21 deadlines.

22 WHEREAS, on December 8, 2022, Plaintiffs National Bail Fund Network, *et al.*, (“Plaintiffs”)
23 filed the Complaint asserting claims under the Freedom of Information Act (“FOIA”), to which
24 Defendants U.S. Immigration and Customs Enforcement and U.S. Department of Homeland Security
25 (“Defendants”) filed an Answer and Affirmative Defenses on February 10, 2023. (ECF No. 32).

26 WHEREAS, an Initial Case Management Conference is currently set for May 9, 2023. (ECF No.
27 41).

1 WHEREAS, the Parties have met and conferred regarding case management and FOIA record
2 production issues.

3 WHEREAS, as a result of that meet and confer, the Parties agree that Defendants will make an
4 initial production in response to Plaintiffs' FOIA request on or before April 30, 2023, and a second
5 production on or before May 31, 2023. The Parties further agree that additional time is needed for
6 Defendants to continue processing records in response to Plaintiffs' FOIA request, and to determine
7 what records will be made proactively available on Defendants' website. The Parties also require
8 additional time to determine whether they have any further disputes and, if so, whether they can be
9 resolved without the need for further litigation.

10 NOW THEREFORE, the Parties hereby STIPULATE, by and through their undersigned counsel,
11 pursuant to Civil Local Rules 6-2 and 7-12, and based on the accompanying Declaration of David M.
12 DeVito, that the initial case management conference should be continued to July 18, 2023 at 2:00 p.m.,
13 or any date thereafter that is convenient for the Court, and that any associated deadlines shall be
14 continued in conformity therewith; and the Parties respectfully request that the Court order the
15 continuance.

16 IT IS SO STIPULATED.

17
18 DATED: April 24, 2023

Respectfully submitted,

19 ISMAIL J. RAMSEY
20 United States Attorney

21 /s/ David M. DeVito
22 DAVID M. DEVITO
Assistant United States Attorney

*Attorneys for Defendants**

23 DATED: April 24, 2023

IMMIGRANT LEGAL DEFENSE

24 /s/ Claudia Valenzuela
25 CLAUDIA VALENZUELA

26 *Attorneys for Plaintiffs*

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28 * In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty
of perjury that counsel for Plaintiffs has concurred in the filing of this document.

ORDER

Pursuant to the stipulation of the parties, it is hereby ordered that:

1. The Telephonic Case Management Conference currently set for May 9, 2023 at 2:00 p.m. is hereby continued to July 18, 2023 at 2:00 p.m.; and
2. The Parties will provide the Court with a Joint Case Management Statement by July 11, 2023.

NOTE: All attorneys and pro se litigants appearing for a telephonic case management conference are required to dial-in at least 15 minutes before the hearing to check-in with the CRD.

IT IS SO ORDERED.

DATED: 4/25/2023


HONORABLE HAYWOOD S. GILLIAM, JR.
United States District Judge