

1 ISMAIL J. RAMSEY (CABN 189820)
United States Attorney
2 MICHELLE LO (NYRN 4325163)
Chief, Civil Division
3 SAPNA MEHTA (CABN 288238)
Assistant United States Attorney

4 450 Golden Gate Avenue, Box 36055
5 San Francisco, California 94102-3495
Telephone: (415) 436-7478
6 FAX: (415) 436-6748
7 sapna.mehta@usdoj.gov

8 Attorneys for Defendant

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 (as modified)**

) Date: May 2, 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 May 2, 2023 to June 8, 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 have had productive
28 discussions over possible resolution of Plaintiffs’ fee request and are optimistic that they

1 will be able to reach agreement without the need for motion practice but require
2 additional time to conclude those discussions. The parties thus stipulate and request that
3 the case management conference currently scheduled for May 2, 2023 be continued by
4 one month to June 8, 2023. The parties will provide the Court with a joint status report
5 by June 1, 2023 if this matter has not been resolved by that time. If resolution is reached
6 before then, the parties will file a stipulation of dismissal.

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

9 Respectfully submitted,

10 ISMAIL J. RAMSEY
11 United States Attorney

12 Dated: April 25, 2023

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

17 Dated: April 25, 2023

18 THE CENTER FOR INVESTIGATIVE REPORTING

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

22 **ATTESTATION**

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

25 Dated: April 25, 2023

26 By: /s/ Sapna Mehta
27 SAPNA MEHTA
28 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 May 2, 2023 is continued to June 6, 2023 at 2:00 p.m. The parties will file a joint status report by May 30, 2023. All counsel shall use the following dial-in information to access the call: Dial-In: 888-808-6929/Passcode: 6064255.

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


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