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

11 AMERICAN CIVIL LIBERTIES UNION OF)
12 NORTHERN CALIFORNIA, *et al.*,)

13 Plaintiffs,)

14 v.)

15 U.S. IMMIGRATION AND CUSTOMS)
16 ENFORCEMENT, *et al.*,)

17 Defendants.)

No. 4:21-cv-02632-DMR

**STIPULATION TO CONTINUE FURTHER
CASE MANAGEMENT CONFERENCE;
ORDER (AS MODIFIED)**

18 Plaintiffs American Civil Liberties Union of Northern California, Mijente Support Committee,
19 Just Futures Law, and Immigrant Defense Project (“Plaintiffs”) and defendants U.S. Immigration and
20 Customs Enforcement (“ICE”), U.S. Customs and Border Protection (“CBP”), and U.S. Department of
21 Homeland Security (“DHS”) (“Defendants”), by and through their undersigned counsel, hereby
22 STIPULATE and respectfully REQUEST that the Court continue the parties’ further case management
23 conference (“CMC”) set for June 21, 2023 at 1:30 p.m., ECF No. 67, by six (6) weeks, until **August 2,**
24 **2023 at 1:30 p.m.**, with the parties’ updated joint CMC statement due by July 26, 2023. This stipulation
25 is based on the following facts:

26 1. This action, filed on April 13, 2021 under the Freedom of Information Act (“FOIA”),
27 concerns one FOIA request Plaintiffs directed to Defendants, dated July 6, 2020. ECF No. 1 at 20-23.
28 As the parties previously reported to the Court, since the filing of the lawsuit, Defendants answered the

1 complaint, the parties met and conferred regarding the FOIA request and the collection and processing
 2 of records, including by telephone and email, and Defendants worked to respond to the Request. *See,*
 3 *e.g.*, ECF Nos. 27, 35, 38, 41, 46, 62.

4 2. At the parties’ last CMC on April 19, 2023, the parties reported that that they had “agreed
 5 that ICE will make a final production of documents by April 2023, which will fully resolve the case on
 6 the merits. The parties agreed to meet and confer on the remaining issue of attorneys’ fees and costs.”
 7 ECF No. 67. The Court set a further CMC for June 21, 2023, with the parties’ updated joint CMC
 8 statement due by June 14, 2023.

9 3. Since the date of the parties’ last CMC, ICE made its final production and the case has
 10 thereby been fully resolved on the merits. The parties have been meeting and conferring regarding the
 11 remaining issue of attorneys’ fees and costs, and seek additional time for further discussions before
 12 either presenting any remaining issues to the Court or stipulating to dismissal of this action in its entirety
 13 with prejudice. Accordingly, the parties stipulate and respectfully request that the Court continue the
 14 parties’ CMC by six (6) weeks, from June 21, 2023 until August 2, 2023, so the parties can continue this
 15 process. The parties respectfully submit that this is the most efficient manner to proceed and will
 16 conserve the parties’ and Court’s resources.

17 SO STIPULATED.

18 Respectfully submitted,

19 ISMAIL J. RAMSEY
 United States Attorney

20 Dated: June 13, 2023

21 By: /s/ Savith Iyengar
 SAVITH IYENGAR
 Assistant United States Attorney
 Attorney for Defendant

22 Dated: June 13, 2023

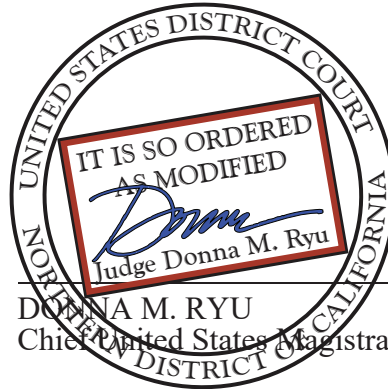
23 By: **/s/ Sana Singh
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 28 ** Pursuant to Civ. L.R. 5-1(h)(3), the filer of the document
 has obtained approval from this signatory.

ORDER (AS MODIFIED)

IT IS HEREBY ORDERED that the further Case Management Conference currently set for June 21, 2023 at 1:30 p.m. is vacated and continued to August 16, 2023 at 1:30 p.m. in Oakland, by Videoconference only. The parties shall submit an updated joint case management conference statement by August 9, 2023. All counsel and parties may access the webinar information (public hearings) at <https://cand.uscourts.gov/judges/ryu-donna-m-dmr/>

Dated: June 14, 2023



DONNA M. RYU
Chief United States Magistrate Judge