

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

NATIONAL BAIL FUND NETWORK, et al.,)	Case No. 4:22-cv-07772-HSG
Plaintiffs,)	STIPULATION AND ORDER TO CONTINUE
v.)	INITIAL CASE MANAGEMENT
U.S. IMMIGRATION AND CUSTOMS)	CONFERENCE
ENFORCEMENT, et al.,)	CMC: July 18, 2023 at 2p.m.
Defendants.)	
)	
)	
)	

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

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

WHEREAS, an Initial Case Management Conference is currently set for July 18, 2023. (ECF No. 43).

WHEREAS, the Parties met and conferred regarding case management and FOIA record production issues and agreed-upon a production schedule (ECF No. 42) and Defendants produced records pursuant to that schedule.

1 WHEREAS, Plaintiffs requested and Defendants agreed to additional time for Plaintiffs to
2 review Defendants' second production, produced on or around May 30, 2023. The Parties also require
3 additional time to determine whether they have any further disputes and, if so, whether they can be
4 resolved without the need for further litigation.

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

11 IT IS SO STIPULATED.

13 DATED: June 28, 2023

Respectfully submitted,

14 IMMIGRANT LEGAL DEFENSE

15 /s/ Claudia Valenzuela
16 CLAUDIA VALENZUELA

17 *Attorneys for Plaintiffs**

18 DATED: June 28, 2023

ISMAIL J. RAMSEY
United States Attorney

20 /s/ Sapna Mehta
21 SAPNA MEHTA
Assistant United States Attorney

22 *Attorneys for Defendants*

26 _____
27 * In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty
28 of perjury that counsel for Defendants 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 July 18, 2023 at 2:00 p.m. is hereby continued to August 15, 2023 at 2:00 p.m.; and
2. The Parties will provide the Court with a Joint Case Management Statement by August 8, 2023.

IT IS SO ORDERED.

DATED: 6/29/2023


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