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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,)
14 v.) **STIPULATED REQUEST TO VACATE**
) **SUMMARY JUDGMENT BRIEFING**
15 U.S. IMMIGRATION AND CUSTOMS) **SCHEDULE; ORDER**
16 ENFORCEMENT and U.S. DEPARTMENT)
OF HOMELAND SECURITY,)
17 Defendants.)
18

19 Plaintiffs National Bail Fund Network, NorCal Resist, Refugee and Immigrant Center for
20 Education and Legal Services, Prairielands Freedom Fund, and American Immigration Council
21 (“Plaintiffs”) and Defendants United States Immigration and Customs Enforcement and U.S.
22 Department of Homeland Security (“Defendants”), by and through their undersigned counsel, submit
23 this stipulated request to vacate the summary judgment briefing schedule set forth in the Court’s
24 September 8, 2023 Scheduling Order (Dkt. 53). This stipulation is based on the following facts:

- 25 1. Plaintiffs filed a complaint initiating this case on December 8, 2022, asserting claims
26 under the Freedom of Information Act (“FOIA”).
27 2. The Court set the following schedule (Dkt. 53) for briefing of the parties’ cross-motions
28

1 for summary judgment: Defendants' motion is due by October 20, 2023, Plaintiffs'
2 opposition and cross-motion is due by November 17, 2023, Defendants' opposition and
3 reply is due by December 1, 2023, and Plaintiffs' reply is due by December 8, 2023. A
4 hearing on the motions for summary judgment is set for December 14, 2023.

- 5 3. The parties have been meeting and conferring to narrow the issues in dispute in this case
6 and have made significant progress towards informally resolving all issues, including the
7 substantive issues in this case and Plaintiffs' request for attorneys' fees. To give the
8 parties additional time to continue those discussions so that they may attempt to resolve
9 this matter, the parties stipulate and request that the deadlines for the summary judgment
10 briefing schedule be vacated.
- 11 4. The parties will file a joint status report by December 11, 2023. If resolution is reached
12 before then, the parties will file a stipulation of dismissal.
- 13 5. The parties respectfully submit that this is the most efficient manner in which to proceed
14 and will conserve both the parties' and the Court's resources.

15
16 DATED: October 11, 2023

Respectfully submitted,

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18 ISMAIL J. RAMSEY
United States Attorney

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

21 Attorney for Defendants

22
23 DATED: October 11, 2023

IMMIGRANT LEGAL DEFENSE

24 /s/ Jessica Zhang
25 JESSICA ZHANG

26 Attorneys for Plaintiffs
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ATTESTATION

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

Dated: October 11, 2023


By: /s/ Sapna Mehta
SAPNA MEHTA
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 summary judgment briefing deadlines set forth in the Scheduling Order (Dkt. 53) are VACATED. The parties shall file a joint status report by December 11, 2023.

IT IS SO ORDERED.

DATED: 10/12/2023


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