District Judge Tana Lin 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 THE UNIVERSITY OF WASHINGTON, a Case No. 2:22-cv-01329-TL Washington State Agency; THE CENTER FOR 10 HUMAN RIGHTS AT THE UNIVERSITY OF STIPULATION AND ORDER FOR WASHINGTON, a research center created by state **EXTENSION OF TIME** 11 law; and ANGELA GODOY, Director of the Center for Human Rights at the University of Noted For Consideration: 12 Washington, November 30, 2023 13 Plaintiffs. 14 v. 15 UNITED STATES DEPARTMENT OF HOMELAND SECURITY; and UNITED STATES 16 **IMMIGRATION AND CUSTOMS** ENFORCEMENT, 17 Defendants. 18 19 The parties make the following stipulation and move to extend the trial date and related 20 deadlines. 21 A court may modify a deadline for good cause. Fed. R. Civ. P. 6(b). Continuing pretrial 22 and trial dates is within the discretion of the trial judge. See King v. State of California, 23 784 F.2d 910, 912 (9th Cir. 1986). 24 STIPULATION FOR EXTENSION OF TIME 2:22-cv-01329-TL PAGE-1

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The parties submit there is good cause for an extension of the deadline. Since the last extension, ICE has produced additional information and the parties have exchanged proposals in good faith on one remaining request. The parties are continuing to narrow the issues and remain hopeful that the matter can be resolved without briefing on the merits. The parties want to work through the few remaining issues expeditiously with using as little Court resources as possible.

Counsel have conferred and the parties jointly request that the below dates be extended based on the parties' continuing efforts to date. The parties both agree that additional time is necessary in order to properly work through the issues in this case and resolve it without the need for motion practice or at least minimizing the number of issues that need to be brought to the Court's attention. Continuing the existing deadlines for a limited time will allow the parties to efficiently address all issues for the Court's review.

The parties propose the following deadlines:

<u>Deadline</u>	<u>Current Date</u>	Extended Date
Discovery Cutoff	November 30, 2023	January 29, 2024
Dispositive Motions	January 5, 2024	March 5, 2024

DATED this 30th day of November, 2023

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Special Assistant Attorneys General Sy Daniel A. Fiedler DANIEL A. FIEDLER, WSBA #56436 920 Fifth Avenue, Suite 3300 Seattle, WA 98104-1610 Phone: 206-622-3150 Fax: 206-757-7700 Email: danielfiedler@dwt.com Thomas R. Burke, Pro Hac Vice 505 Montgomery Street, Suite 800 San Francisco, CA 94111-6533 Phone: 415-276-6552 Fax: 415-276-6599 Email: thomasburke@dwt.com Counsel for Plaintiffs The Parties having stipulated and agreed, it is hereby so ORD Dated this 30th day of November 2023. Acting Unit sy Nickolas NICKOLAS Assistant Unit Tousted State NICKOLAS Assistant Unit Counted State NICKOLAS Assistant United State NICKOLAS Assistant Uni	Vana K.
Special Assistant Attorneys General Sy Daniel A. Fiedler	Acting United States Attorney s/Nickolas Bohl NICKOLAS BOHL WSBA #48978 Assistant United States Attorney United States Attorney's Office 700 Stewart Street, Suite 5220 Seattle, Washington 98101-1271 Phone: 206-553-7970 Fax: 206-553-4067 Email: nickolas.bohl@usdoj.gov Counsel for Defendants I certify that this memorandum contains 244 words in compliance with the Local Rules.
S Daniel A. Fiedler DANIEL A. FIEDLER, WSBA #56436 Assistant United State 920 Fifth Avenue, Suite 3300 United State Seattle, WA 98104-1610 700 Stewnord Phone: 206-622-3150 Seattle, Was Phone: 206-622-3150 Email: danielfiedler@dwt.com Fax: 206-55 Email: nick Thomas R. Burke, Pro Hac Vice 505 Montgomery Street, Suite 800 San Francisco, CA 94111-6533 Phone: 415-276-6552 I certify that Fax: 415-276-6599 Email: thomasburke@dwt.com Counsel for Plaintiffs Dated this 30th day of November 2023. ORDER The Parties having stipulated and agreed, it is hereby so ORD Dated this 30th day of November 2023. Tana Lin United States Dated Counsel for Dated	Assistant United States Attorney United States Attorney's Office 700 Stewart Street, Suite 5220 Seattle, Washington 98101-1271 Phone: 206-553-7970 Fax: 206-553-4067 Email: nickolas.bohl@usdoj.gov Counsel for Defendants I certify that this memorandum contains 248 words in compliance with the Local Rules.
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