U.S. District Court District of Columbia (Washington, DC) CIVIL DOCKET FOR CASE #: 1:22-cv-01165-JMC

DAHLSTROM et al v. UNITED STATES DEPARTMENT OF HOMELAND SECURITY Assigned to: Judge Jia M. Cobb Cause: 05:552 Freedom of Information Act

Plaintiff

JULIE ANN DAHLSTROM

Date Filed: 04/27/2022 Jury Demand: None Nature of Suit: 895 Freedom of Information Act Jurisdiction: U.S. Government Defendant

represented by Tom Hamlin

ROBINS KAPLAN LLP 800 LaSalle Avenue 2800 Lasalle Plaza Minneapolis, MN 55402 612–349–8579 Email: <u>thamlin@robinskaplan.com</u> *LEAD ATTORNEY PRO HAC VICE ATTORNEY TO BE NOTICED*

Christopher L. Hamlin MCNAMEE, HOSEA, JERNIGAN, KIM, GREENAN & LYNCH, P.A. 6411 Ivy Lane Suite 200 Greenbelt, MD 20770 (301) 441–2420 Fax: 301–982–9450 Email: <u>chamlin@mhlawyers.com</u> *ATTORNEY TO BE NOTICED*

<u>Plaintiff</u> HEBA GOWAYED

represented by Tom Hamlin

(See above for address) LEAD ATTORNEY PRO HAC VICE ATTORNEY TO BE NOTICED

Christopher L. Hamlin

(See above for address) ATTORNEY TO BE NOTICED

V.

<u>Defendant</u>

UNITED STATES DEPARTMENT OF HOMELAND SECURITY

represented by Brenda A. Gonzalez Horowitz

DOJ–USAO U.S. Department of Justice 601 D Street NW Washington, DC 20530 (202) 252–2512 Email: <u>brenda.gonzalez.horowitz@usdoj.gov</u> *LEAD ATTORNEY ATTORNEY TO BE NOTICED*

Date Filed	#	Docket Text
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04/27/2022	<u>1</u>	COMPLAINT against UNITED STATES DEPARTMENT OF HOMELAND SECURITY (Filing fee \$ 402 receipt number ADCDC–9198792) filed by JULIE ANN DAHLSTROM, HEBA GOWAYED. (Attachments: # 1 Civil Cover Sheet, # 2 Exhibit 1, # 3 Exhibit 2, # 4 Exhibit 3, # 5 Exhibit 4, # 6 Exhibit 5, # 7 Exhibit A, # 8 Exhibit B, # 9 Exhibit C, # 10 Exhibit D, # 11 Exhibit E, # 12 Exhibit F, # 13 Exhibit G, # 14 Exhibit H, # 15 Summons)(Hamlin, Christopher) (Entered: 04/27/2022)
04/29/2022		NOTICE OF ERROR re <u>1</u> Complaint; emailed to chamlin@mhlawyers.com, cc'd 2 associated attorneys — The PDF file you docketed contained errors: 1. Noncompliance with LCvR 5.1(c). Please file an errata correcting the initiating pleading to include the name & full residence address of each party using the event Errata., 2. Missing summonses–government. When naming a government agent or agency as a defendant, you must supply a summons for each defendant & two additional summonses for the U.S. Attorney & U.S. Attorney General. Please submit using the event Request for Summons to Issue., 3. COMPLIANCE DEADLINE is by close of business today. This case will not proceed any further until all errors are satisfied. (zmh,) (Entered: 04/29/2022)
04/29/2022	<u>2</u>	ERRATA – <i>Corrected Civil Cover Sheet</i> by JULIE ANN DAHLSTROM, HEBA GOWAYED re <u>1</u> Complaint, filed by JULIE ANN DAHLSTROM, HEBA GOWAYED. (Hamlin, Christopher) (Entered: 04/29/2022)
04/29/2022	<u>3</u>	REQUEST FOR SUMMONS TO ISSUE upon Merrick B. Garland, US Department of Justice and Matthew M. Graves, US Attorney for District of Columbia re <u>1</u> Complaint, filed by JULIE ANN DAHLSTROM, HEBA GOWAYED. Related document: <u>1</u> Complaint, filed by JULIE ANN DAHLSTROM, HEBA GOWAYED. (Attachments: <u># 1</u> Summons)(Hamlin, Christopher) (Entered: 04/29/2022)
04/29/2022		Case Assigned to Judge Jia M. Cobb. (zmh) (Entered: 04/29/2022)
04/29/2022	<u>4</u>	SUMMONS(3) Issued Electronically as to UNITED STATES DEPARTMENT OF HOMELAND SECURITY, U.S. Attorney and U.S. Attorney General (Attachment: # <u>1</u> Notice and Consent)(zmh) (Entered: 04/29/2022)
05/11/2022	<u>5</u>	MOTION for Preliminary Injunction by JULIE ANN DAHLSTROM, HEBA GOWAYED. (Attachments: # <u>1</u> Memorandum in Support of Plaintiffs' Motion for a Preliminary Injunction)(Hamlin, Christopher) (Entered: 05/11/2022)
05/17/2022	<u>6</u>	NOTICE of Proposed Order by JULIE ANN DAHLSTROM, HEBA GOWAYED re <u>5</u> MOTION for Preliminary Injunction (Hamlin, Christopher) (Entered: 05/17/2022)
05/18/2022	7	ERRATA – Exhibit A was inadvertently omitted from the filing of Plaintiff's Motion for Preliminary Injunction by JULIE ANN DAHLSTROM, HEBA GOWAYED re <u>5</u> MOTION for Preliminary Injunction filed by JULIE ANN DAHLSTROM, HEBA GOWAYED. (Hamlin, Christopher) (Entered: 05/18/2022)
05/20/2022	<u>8</u>	CERTIFICATE OF SERVICE by JULIE ANN DAHLSTROM, HEBA GOWAYED re <u>5</u> MOTION for Preliminary Injunction . (Attachments: # <u>1</u> Exhibit)(Hamlin, Christopher) (Entered: 05/20/2022)
05/24/2022	<u>9</u>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name– Thomas L. Hamlin, Filing fee \$ 100, receipt number ADCDC–9259093. Fee Status: Fee Paid. by JULIE ANN DAHLSTROM, HEBA GOWAYED. (Attachments: # <u>1</u> Declaration of Thomas L. Hamlin Support of Motion for Admission Pro Hac Vice)(Hamlin, Christopher) (Entered: 05/24/2022)
05/24/2022		MINUTE ORDER granting 2 Motion for Leave to Appear Pro Hac Vice: Thomas L Hamlin is hereby admitted pro hac vice to appear in this matter. Counsel should register for e-filing via PACER and file a notice of appearance pursuant to LCvR 83.6(a) <u>Click for instructions</u> . Signed by Judge Jia M. Cobb on May 24, 2022. (lcjmc1) (Entered: 05/24/2022)
05/24/2022		NOTICE OF ERROR re <u>9</u> Motion for Leave to Appear Pro Hac Vice; emailed to chamlin@mhlawyers.com, cc'd 2 associated attorneys — The PDF file you docketed contained errors: 1. Please note the following deficiency and file/refile document as instructed , 2. Declaration must have an original, ink signature; refile using the event Declaration (zjf,) (Entered: 05/24/2022)

05/25/2022	<u>10</u>	DECLARATION of Thomas L. Hamlin in Support of Motion for Admission of Thomas L. Hamlin Pro Hac Vice Pursuant to LCvR 83.2(d) by JULIE ANN DAHLSTROM, HEBA GOWAYED re Notice of QC,. (Hamlin, Christopher) (Entered: 05/25/2022)	
05/26/2022	<u>11</u>	NOTICE of Appearance by Brenda A. Gonzalez Horowitz on behalf of UNITED STATES DEPARTMENT OF HOMELAND SECURITY (Gonzalez Horowitz, Brenda) (Entered: 05/26/2022)	
05/26/2022	<u>12</u>	ENTERED IN ERRORMOTION for Leave to Appear of Thomas L. Hamlin as counsel on behalf of Plaintiff's Julie Ann Dahlstrom and Heba Gowayed by JULIE ANN DAHLSTROM, HEBA GOWAYED. (Hamlin, Christopher) Modified on 5/26/2022 (zjf). (Entered: 05/26/2022)	
05/26/2022		NOTICE OF ERROR regarding <u>12</u> MOTION for Leave to Appear of Thomas L. Hamlin as counsel on behalf of Plaintiff's Julie Ann Dahlstrom and Heba Gowayed . The following error(s) need correction: Invalid attorney signature– signature on document must match PACER login. Please refile using assigned login/password for Thomas L. Hamlin. (zjf) (Entered: 05/26/2022)	
05/26/2022	<u>13</u>	Unopposed MOTION for Extension of Time to <i>File Response to Plaintiffs' Motion for a Preliminary Injunction</i> by UNITED STATES DEPARTMENT OF HOMELAND SECURITY. (Gonzalez Horowitz, Brenda) (Entered: 05/26/2022)	
05/27/2022	<u>14</u>	NOTICE of Appearance by Tom Hamlin on behalf of All Plaintiffs (Hamlin, Tom) (Entered: 05/27/2022)	
05/31/2022		MINUTE ORDER granting <u>13</u> UNOPPOSED MOTION FOR EXTENSION OF TIME: Having considered the motion and for good cause shown, the Court grants the motion. Defendant shall file its response to <u>5</u> Plaintiffs' Motion for a Preliminary Injunction by June 3, 2022. Signed by Judge Jia M. Cobb on May 31, 2022. (lcjmc1) (Entered: 05/31/2022)	
06/01/2022	<u>15</u>	MOTION for Hearing re <u>5</u> MOTION for Preliminary Injunction by JULIE ANN DAHLSTROM, HEBA GOWAYED. (Hamlin, Christopher) (Entered: 06/01/2022)	
06/02/2022	<u>16</u>	RESPONSE re <u>15</u> MOTION for Hearing re <u>5</u> MOTION for Preliminary Injunction filed by UNITED STATES DEPARTMENT OF HOMELAND SECURITY. (Gonzalez Horowitz, Brenda) (Entered: 06/02/2022)	
06/03/2022	<u>17</u>	REPLY re <u>15</u> MOTION for Hearing re <u>5</u> MOTION for Preliminary Injunction filed by JULIE ANN DAHLSTROM, HEBA GOWAYED. (Hamlin, Christopher) Modified of 6/6/2022 to correct docket link (zjm). (Entered: 06/03/2022)	
06/03/2022	<u>18</u>	Memorandum in opposition to re <u>5</u> MOTION for Preliminary Injunction filed by UNITED STATES DEPARTMENT OF HOMELAND SECURITY. (Attachments: # Declaration of Cynthia Munita)(Gonzalez Horowitz, Brenda) (Entered: 06/03/2022)	
06/06/2022	<u>19</u>	ANSWER to Complaint by UNITED STATES DEPARTMENT OF HOMELAND SECURITY.(Gonzalez Horowitz, Brenda) (Entered: 06/06/2022)	
06/07/2022	<u>20</u>	MOTION for Extension of Time to File Response/Reply as to <u>5</u> MOTION for Preliminary Injunction by JULIE ANN DAHLSTROM, HEBA GOWAYED. (Attachments: # <u>1</u> Proposed Order)(Hamlin, Christopher) (Entered: 06/07/2022)	
06/08/2022	<u>21</u>	MEMORANDUM re <u>20</u> MOTION for Extension of Time to File Response/Reply as t <u>5</u> MOTION for Preliminary Injunction filed by JULIE ANN DAHLSTROM, HEBA GOWAYED by JULIE ANN DAHLSTROM, HEBA GOWAYED. (Hamlin, Christopher) (Entered: 06/08/2022)	
06/09/2022		MINUTE ORDER granting <u>20</u> Plaintiff's Motion for Limited Extension of Time to File Reply to Defendant's Opposition to Motion for Preliminary Injunction: Having considered the motion and for good cause shown, this motion is granted. Plaintiffs shall file their reply to <u>18</u> Defendant's Opposition to <u>5</u> Plainitffs' Motion for a Preliminary Injunction by June 15, 2022. Signed by Judge Jia M. Cobb on June 9, 2022. (lcjmc1) (Entered: 06/09/2022)	
06/09/2022		MINUTE ORDER granting <u>15</u> Plaintiffs' Request for Hearing on Motion for Preliminary Injunction: Having considered the motion, the Government's taking no position on the propriety of having a hearing, and the entire record, the Court grants	

		this motion. Given the Parties' representations about their availability, the Parties are directed to appear for oral argument on <u>5</u> Plaintiffs' Motion for a Preliminary Injunction at 10:30 AM on July 14, 2022. The oral argument will be on the record and conducted via video. The Court's Deputy Clerk will provide the information necessary to access the call. Signed by Judge Jia M. Cobb on June 9, 2022. (lcjmc1) (Entered: 06/09/2022)
06/09/2022		Set/Reset Hearings: Motion Hearing set for 7/14/2022 at 10:30 AM via video conference before Judge Jia M. Cobb. (zgdf) (Entered: 06/09/2022)
06/13/2022	<u>22</u>	REPLY to opposition to motion re <u>5</u> MOTION for Preliminary Injunction filed by JULIE ANN DAHLSTROM, HEBA GOWAYED. (Attachments: # <u>1</u> Exhibit A)(Hamlin, Christopher) (Entered: 06/13/2022)
06/14/2022	<u>23</u>	NOTICE <i>Regarding Plaintiffs' Incomplete Exhibit A (ECF No. 22–1)</i> by UNITED STATES DEPARTMENT OF HOMELAND SECURITY (Attachments: # <u>1</u> Exhibit 1, June 1, 2022 Correspondence)(Gonzalez Horowitz, Brenda) (Entered: 06/14/2022)
07/06/2022	<u>24</u>	DECLARATION of Thomas L. Hamlin in Support of His Admission Pro Hac Vice by JULIE ANN DAHLSTROM, HEBA GOWAYED. (Hamlin, Tom) (Entered: 07/06/2022)
07/07/2022	<u>25</u>	MEMORANDUM re <u>15</u> MOTION for Hearing re <u>5</u> MOTION for Preliminary Injunction filed by JULIE ANN DAHLSTROM, HEBA GOWAYED by JULIE ANN DAHLSTROM, HEBA GOWAYED. (Hamlin, Tom) (Entered: 07/07/2022)
07/08/2022	<u>26</u>	RESPONSE re <u>25</u> Memorandum filed by UNITED STATES DEPARTMENT OF HOMELAND SECURITY. (Gonzalez Horowitz, Brenda) (Entered: 07/08/2022)
07/13/2022	27	NOTICE of filing of Exhibit 9 re <u>25</u> Plaintiffs' Memorandum Limiting the Issues to be Heard at the July 14, 2022 Preliminary Injunction Hearing by JULIE ANN DAHLSTROM, HEBA GOWAYED. (Hamlin, Tom) Modified on 7/13/2022 to correct docket event/text (zjf). Modified on 7/13/2022 to add docket link (zjf). (Entered: 07/13/2022)
07/13/2022		NOTICE OF ERROR regarding <u>27</u> MOTION for Injunction <i>Exhibit 9 to Plaintiffs'</i> <i>Memorandum Limiting the Issues to be Heard at the July 14, 2022 Preliminary</i> <i>Injunction Hearing.</i> The following error(s) have been corrected : Incorrect event. Counsel is reminded to search for accurate event for e–filing(s) or future filing(s) will be entered in error. (zjf) (Entered: 07/13/2022)
07/14/2022		Minute Entry for Zoom Motion Hearing proceeding held on 7/14/2022 before Judge Jia M. Cobb. Oral order denying as moot <u>5</u> Motion for Preliminary Injunction. Defendant's summary judgment motion due by 8/29/2022. Plaintiffs' response to motion for summary judgment due by 9/19/2022. Defendant's reply to motion for summary judgment due by 9/30/2022. (Court Reporter: Lisa Bankins) (zgdf) (Entered: 07/14/2022)
08/29/2022	<u>28</u>	MOTION for Summary Judgment by UNITED STATES DEPARTMENT OF HOMELAND SECURITY. (Attachments: # <u>1</u> Memorandum in Support, # <u>2</u> Statement of Facts, # <u>3</u> Text of Proposed Order, # <u>4</u> Exhibit 1, Supplemental Munita Declaration)(Gonzalez Horowitz, Brenda) (Entered: 08/29/2022)
09/19/2022	<u>29</u>	Memorandum in opposition to re <u>28</u> Motion for Summary Judgment, filed by JULIE ANN DAHLSTROM, HEBA GOWAYED. (Attachments: # <u>1</u> Declaration of Julie Ann Dahlstrom, # <u>2</u> Declaration of Thomas L. Hamlin, # <u>3</u> Exhibit 10 to Declaration of Thomas I. Hamlin, # <u>4</u> Exhibit 11 to Declaration of Thomas I. Hamlin, # <u>5</u> Exhibit 12 to Declaration of Thomas I. Hamlin, # <u>6</u> Exhibit 12A to Declaration of Thomas I. Hamlin, # <u>7</u> Exhibit 13 to Declaration of Thomas I. Hamlin, # <u>8</u> Exhibit 13A to Declaration of Thomas I. Hamlin, # <u>9</u> Exhibit 14 to Declaration of Thomas I. Hamlin, # <u>10</u> Exhibit 15 to Declaration of Thomas I. Hamlin)(Hamlin, Tom) (Entered: 09/19/2022)
09/19/2022	<u>30</u>	NOTICE of Proposed Order <i>Denying Defendant's Motion for Summary Judgment</i> by JULIE ANN DAHLSTROM, HEBA GOWAYED re <u>29</u> Memorandum in Opposition,, (Hamlin, Tom) (Entered: 09/19/2022)

09/19/2022	<u>31</u>	MOTION for Oral Hearing of Plaintiffs' Request for Oral Hearing on Defendant's Motion for Summary Judgment by JULIE ANN DAHLSTROM, HEBA GOWAYED re <u>29</u> Memorandum in Opposition,, (Hamlin, Tom) Modified docket event/text on 9/21/2022 (zed). (Entered: 09/19/2022)
09/30/2022	<u>32</u>	REPLY to opposition to motion re <u>28</u> MOTION for Summary Judgment filed by UNITED STATES DEPARTMENT OF HOMELAND SECURITY. (Gonzalez Horowitz, Brenda) (Entered: 09/30/2022)
01/25/2023		MINUTE ORDER as to <u>31</u> Plaintiffs' Motion for Oral Hearing: Upon consideration of the Plaintiffs' Motion and in light of the Defendant's lack of opposition to it, it is hereby ORDERED that the Motion is GRANTED. The Court ORDERS the Parties to appear for a Summary Judgment Hearing in Courtroom 21 on March 16, 2023, at 11:00 AM. Signed by Judge Jia M. Cobb on January 25, 2023. (lcjmc2) (Entered: 01/25/2023)
02/22/2023		MINUTE ORDER: The previously scheduled March 16, 2023, Summary Judgment Hearing is VACATED, and the Court ORDERS that the Summary Judgment Hearing will now be held in person in Courtroom 21 on March 16, 2023, at 10:00 AM. Signed by Judge Jia M. Cobb on February 22, 2023. (lcjmc2) (Entered: 02/22/2023)
03/16/2023		Minute Entry for proceedings held before Judge Jia M. Cobb: Motion Hearing held on 3/16/2023. Oral agruments heard re <u>28</u> MOTION for Summary Judgment and taken under advisement. (Court Reporter: Stacy Heavenridge) (zgf) (Entered: 03/16/2023)
02/27/2024		MINUTE ORDER: In the interest of judicial efficiency, the Court requests that the Parties confer and inform the Court of any developments that have taken place after the briefing and argument on the motion for summary judgment, including whether any disputes have been narrowed or resolved since that time. The Parties are ORDERED to file a joint status report containing any such information by March 12, 2024. Signed by Judge Jia M. Cobb on February 27, 2024. (lcjmc3) (Entered: 02/27/2024)
03/12/2024	<u>33</u>	ENTERED IN ERRORMEET AND CONFER STATEMENT. (Hamlin, Tom) Modified on 3/13/2024 (zdp). (Entered: 03/12/2024)
03/12/2024	<u>34</u>	STATUS REPORT by UNITED STATES DEPARTMENT OF HOMELAND SECURITY. (Gonzalez Horowitz, Brenda) (Entered: 03/12/2024)
03/13/2024		NOTICE OF ERROR regarding <u>33</u> Meet and Confer Statement. The following error(s) need correction: Incorrect format (Letter)– correspondence is not permitted (LCvR 5.1(a)). Please refile. (zdp) (Entered: 03/13/2024)
03/13/2024	<u>35</u>	MEET AND CONFER STATEMENT. (Attachments: # <u>1</u> Exhibit A)(Hamlin, Tom) (Entered: 03/13/2024)