

**U.S. District Court
Southern District of New York (Foley Square)
CIVIL DOCKET FOR CASE #: 1:22-cv-08344-ER**

Haitian Bridge Alliance et al v. U.S. Department of Homeland Security et al
Assigned to: Judge Edgardo Ramos
Cause: 05:552 Freedom of Information Act

Date Filed: 09/30/2022
Jury Demand: None
Nature of Suit: 895 Freedom of Information Act
Jurisdiction: U.S. Government Defendant

Plaintiff

Haitian Bridge Alliance

represented by **Stephen Manning**
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TERMINATED: 09/21/2023

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Plaintiff

African Communities Together

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LEAD ATTORNEY
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TERMINATED: 02/07/2024

Lauren Michel Wilfong
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Michael Linhorst
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Sara Fatima Dhanji
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TERMINATED: 09/21/2023

Sarah Decker
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Tess Margaret Hellgren
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Stephen Joseph Fuzesi
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Plaintiff

UndocuBlack Network

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Sara Fatima Dhanji
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V.

Defendant

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Defendant

U.S. Immigration and Customs Enforcement

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Defendant

Federal Bureau of Prisons

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ATTORNEY TO BE NOTICED

Tomoko Onozawa
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ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
09/30/2022	<u>1</u>	COMPLAINT against Federal Bureau of Prisons, U.S. Customs and Border Protection, U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement. (Filing Fee \$ 402.00, Receipt Number BNYSDC-26754675)Document filed by Haitian Bridge Alliance, UndocuBlack Network, African Communities Together. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B).(Fuzesi, Stephen) (Entered: 09/30/2022)
09/30/2022	<u>2</u>	CIVIL COVER SHEET filed..(Fuzesi, Stephen) (Entered: 09/30/2022)
09/30/2022	<u>3</u>	RULE 7.1 CORPORATE DISCLOSURE STATEMENT. No Corporate Parent. Document filed by African Communities Together..(Fuzesi, Stephen) (Entered: 09/30/2022)
09/30/2022	<u>4</u>	RULE 7.1 CORPORATE DISCLOSURE STATEMENT. No Corporate Parent. Document filed by Haitian Bridge Alliance..(Fuzesi, Stephen) (Entered: 09/30/2022)
09/30/2022	<u>5</u>	RULE 7.1 CORPORATE DISCLOSURE STATEMENT. No Corporate Parent. Document filed by UndocuBlack Network..(Fuzesi, Stephen) (Entered: 09/30/2022)
09/30/2022	<u>6</u>	REQUEST FOR ISSUANCE OF SUMMONS as to U.S. Department of Homeland Security, re: <u>1</u> Complaint,. Document filed by African Communities Together, Haitian

		Bridge Alliance, UndocuBlack Network..(Fuzesi, Stephen) (Entered: 09/30/2022)
09/30/2022	<u>7</u>	REQUEST FOR ISSUANCE OF SUMMONS as to U.S. Customs and Border Protection, re: <u>1</u> Complaint,. Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network..(Fuzesi, Stephen) (Entered: 09/30/2022)
09/30/2022	<u>8</u>	REQUEST FOR ISSUANCE OF SUMMONS as to U.S. Immigration and Customs Enforcement, re: <u>1</u> Complaint,. Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network..(Fuzesi, Stephen) (Entered: 09/30/2022)
09/30/2022	<u>9</u>	REQUEST FOR ISSUANCE OF SUMMONS as to Federal Bureau of Prisons, re: <u>1</u> Complaint,. Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network..(Fuzesi, Stephen) (Entered: 09/30/2022)
09/30/2022	<u>10</u>	NOTICE OF APPEARANCE by Sarah Telo Gillman on behalf of African Communities Together, Haitian Bridge Alliance, UndocuBlack Network..(Gillman, Sarah) (Entered: 09/30/2022)
09/30/2022	<u>11</u>	MOTION for Sara Fatima Dhanji to Appear Pro Hac Vice . Filing fee \$ 200.00, receipt number ANYSDC-26756311. Motion and supporting papers to be reviewed by Clerk's Office staff. Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network. (Attachments: # <u>1</u> Affidavit, # <u>2</u> Text of Proposed Order).(Dhanji, Sara) (Entered: 09/30/2022)
10/03/2022		>>>NOTICE REGARDING PRO HAC VICE MOTION. Regarding Document No. <u>11</u> MOTION for Sara Fatima Dhanji to Appear Pro Hac Vice . Filing fee \$ 200.00, receipt number ANYSDC-26756311. Motion and supporting papers to be reviewed by Clerk's Office staff.. The document has been reviewed and there are no deficiencies. (sgz) (Entered: 10/03/2022)
10/03/2022		CASE OPENING INITIAL ASSIGNMENT NOTICE: The above-entitled action is assigned to Judge Edgardo Ramos. Please download and review the Individual Practices of the assigned District Judge, located at https://nysd.uscourts.gov/judges/district-judges . Attorneys are responsible for providing courtesy copies to judges where their Individual Practices require such. Please download and review the ECF Rules and Instructions, located at https://nysd.uscourts.gov/rules/ecf-related-instructions ..(sj) (Entered: 10/03/2022)
10/03/2022		Magistrate Judge Robert W. Lehrburger is so designated. Pursuant to 28 U.S.C. Section 636(c) and Fed. R. Civ. P. 73(b)(1) parties are notified that they may consent to proceed before a United States Magistrate Judge. Parties who wish to consent may access the necessary form at the following link: https://nysd.uscourts.gov/sites/default/files/2018-06/AO-3.pdf . (sj) (Entered: 10/03/2022)
10/03/2022		Case Designated ECF. (sj) (Entered: 10/03/2022)
10/03/2022	<u>12</u>	ELECTRONIC SUMMONS ISSUED as to U.S. Department of Homeland Security. (sj) (Entered: 10/03/2022)
10/03/2022	<u>13</u>	ELECTRONIC SUMMONS ISSUED as to U.S. Customs and Border Protection. (sj) (Entered: 10/03/2022)
10/03/2022	<u>14</u>	ELECTRONIC SUMMONS ISSUED as to Federal Bureau of Prisons. (sj) (Entered: 10/03/2022)
10/03/2022	<u>15</u>	ELECTRONIC SUMMONS ISSUED as to U.S. Immigration and Customs Enforcement. (sj) (Entered: 10/03/2022)
10/03/2022	<u>16</u>	MOTION for Allison Crennen-Dunlap to Appear Pro Hac Vice . Filing fee \$ 200.00, receipt number ANYSDC-26766737. Motion and supporting papers to be reviewed by Clerk's Office staff. Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network. (Attachments: # <u>1</u> Exhibit Affidavit with Certificate of Good Standing, # <u>2</u> Text of Proposed Order Proposed Order).(Crennen-Dunlap, Allison) (Entered: 10/03/2022)

10/04/2022		>>>NOTICE REGARDING PRO HAC VICE MOTION. Regarding Document No. <u>16</u> MOTION for Allison Crennen–Dunlap to Appear Pro Hac Vice . Filing fee \$ 200.00, receipt number ANYSDC–26766737. Motion and supporting papers to be reviewed by Clerk's Office staff.. The document has been reviewed and there are no deficiencies. (sgz) (Entered: 10/04/2022)
10/05/2022	<u>17</u>	NOTICE OF APPEARANCE by Lauren Wilfong on behalf of African Communities Together, Haitian Bridge Alliance, UndocuBlack Network..(Wilfong, Lauren) (Entered: 10/05/2022)
10/05/2022	<u>18</u>	FILING ERROR – DEFICIENT DOCKET ENTRY – MOTION for Stephen W Manning to Appear Pro Hac Vice . Filing fee \$ 200.00, receipt number ANYSDC–26779068. Motion and supporting papers to be reviewed by Clerk's Office staff. Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network. (Attachments: # <u>1</u> Supplement Certificate of Good Standing, # <u>2</u> Affidavit Affidavit of Stephen W Manning in support of PHV).(Manning, Stephen) Modified on 10/6/2022 (aea). (Entered: 10/05/2022)
10/06/2022		>>>NOTICE REGARDING DEFICIENT MOTION TO APPEAR PRO HAC VICE. Notice to RE–FILE Document No. <u>18</u> MOTION for Stephen W Manning to Appear Pro Hac Vice . Filing fee \$ 200.00, receipt number ANYSDC–26779068. Motion and supporting papers to be reviewed by Clerk's Office staff... The filing is deficient for the following reason(s): missing Proposed Order;. Re–file the motion as a Motion to Appear Pro Hac Vice – attach the correct signed PDF – select the correct named filer/filers – attach valid Certificates of Good Standing issued within the past 30 days – attach Proposed Order.. (aea) (Entered: 10/06/2022)
10/11/2022	<u>19</u>	MOTION for Tess Hellgren to Appear Pro Hac Vice . Filing fee \$ 200.00, receipt number ANYSDC–26796583. Motion and supporting papers to be reviewed by Clerk's Office staff. Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network. (Attachments: # <u>1</u> Exhibit Affidavit with Certificates of Good Standing, # <u>2</u> Text of Proposed Order Proposed Order).(Hellgren, Tess) (Entered: 10/11/2022)
10/11/2022	<u>20</u>	AFFIDAVIT OF SERVICE (FOIA CASE). Federal Bureau of Prisons served on 10/7/2022, answer due 11/7/2022; U.S. Customs and Border Protection served on 10/7/2022, answer due 11/7/2022; U.S. Department of Homeland Security served on 10/7/2022, answer due 11/7/2022; U.S. Immigration and Customs Enforcement served on 10/7/2022, answer due 11/7/2022. Service was made by Mail. Document filed by Haitian Bridge Alliance; UndocuBlack Network; African Communities Together..(Dhanji, Sara) (Entered: 10/11/2022)
10/12/2022		>>>NOTICE REGARDING PRO HAC VICE MOTION. Regarding Document No. <u>19</u> MOTION for Tess Hellgren to Appear Pro Hac Vice . Filing fee \$ 200.00, receipt number ANYSDC–26796583. Motion and supporting papers to be reviewed by Clerk's Office staff.. The document has been reviewed and there are no deficiencies. (sac) (Entered: 10/12/2022)
10/14/2022	<u>21</u>	FILING ERROR – DEFICIENT DOCKET ENTRY MOTION for Stephen W Manning to Appear Pro Hac Vice . Motion and supporting papers to be reviewed by Clerk's Office staff. Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network. (Attachments: # <u>1</u> Affidavit Affidavit of Stephen W Manning, # <u>2</u> Supplement Certificate of Good Standing).(Manning, Stephen) Modified on 10/17/2022 (sac). (Entered: 10/14/2022)
10/14/2022	<u>22</u>	FILING ERROR – DEFICIENT DOCKET ENTRY PROPOSED ORDER. Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network. Related Document Number: <u>21</u> ..(Manning, Stephen) Proposed Order to be reviewed by Clerk's Office staff. Modified on 10/17/2022 (sac). (Entered: 10/14/2022)
10/17/2022		>>>NOTICE REGARDING DEFICIENT MOTION TO APPEAR PRO HAC VICE. Notice to RE–FILE Document No. <u>21</u> MOTION for Stephen W Manning to Appear Pro Hac Vice . Motion and supporting papers to be reviewed by Clerk's Office staff.. The filing is deficient for the following reason(s): missing Proposed Order. Re–file the motion as a Motion to Appear Pro Hac Vice – attach

		the correct signed PDF – select the correct named filer/filers – attach valid Certificates of Good Standing issued within the past 30 days – attach Proposed Order. (sac) (Entered: 10/17/2022)
11/02/2022	<u>23</u>	NOTICE OF APPEARANCE by Dana Walsh Kumar on behalf of Federal Bureau of Prisons, U.S. Customs and Border Protection, U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement..(Kumar, Dana) (Entered: 11/02/2022)
11/02/2022	<u>24</u>	LETTER MOTION for Extension of Time to File Answer addressed to Judge Edgardo Ramos from Dana Walsh Kumar dated 11/02/2022. Document filed by Federal Bureau of Prisons, U.S. Customs and Border Protection, U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement..(Kumar, Dana) (Entered: 11/02/2022)
11/03/2022	25	ORDER granting <u>11</u> Motion for Sara Fatima Dhanji to Appear Pro Hac Vice. (HEREBY ORDERED by Judge Edgardo Ramos)(Text Only Order) (jar) (Entered: 11/03/2022)
11/03/2022	26	ORDER granting <u>16</u> Motion for Allison Crennen–Dunlap to Appear Pro Hac Vice. (HEREBY ORDERED by Judge Edgardo Ramos)(Text Only Order) (jar) (Entered: 11/03/2022)
11/03/2022	27	ORDER granting <u>19</u> Motion for Tess Hellgren to Appear Pro Hac Vice. (HEREBY ORDERED by Judge Edgardo Ramos)(Text Only Order) (jar) (Entered: 11/03/2022)
11/03/2022	<u>28</u>	ORDER: granting <u>24</u> Letter Motion for Extension of Time to Answer re <u>24</u> LETTER MOTION for Extension of Time to File Answer. addressed to Judge Edgardo Ramos from Dana Walsh Kumar dated 11/02/2022. Defendant's request for an extension of 30 days, until December 5, 2022, to file their response to the complaint is granted. SO ORDERED. Federal Bureau of Prisons answer due 12/5/2022; U.S. Customs and Border Protection answer due 12/5/2022; U.S. Department of Homeland Security answer due 12/5/2022; U.S. Immigration and Customs Enforcement answer due 12/5/2022. (Signed by Judge Edgardo Ramos on 11/03/2022) (ama) (Entered: 11/03/2022)
11/03/2022	<u>29</u>	NOTICE OF APPEARANCE by Tomoko Onozawa on behalf of Federal Bureau of Prisons, U.S. Customs and Border Protection, U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement..(Onozawa, Tomoko) (Entered: 11/03/2022)
12/04/2022	<u>30</u>	NOTICE OF APPEARANCE OF PRO BONO COUNSEL by Sarah Decker on behalf of African Communities Together, Haitian Bridge Alliance, UndocuBlack Network.(Decker, Sarah) (Entered: 12/04/2022)
12/05/2022	<u>31</u>	ANSWER to <u>1</u> Complaint,. Document filed by Federal Bureau of Prisons, U.S. Customs and Border Protection, U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement..(Kumar, Dana) (Entered: 12/05/2022)
12/21/2022	<u>32</u>	JOINT LETTER addressed to Judge Edgardo Ramos from Counsel for Plaintiffs dated December 21, 2022 re: Request for Excusal From Discovery Plan and Proposed Joint Letter. Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network..(Dhanji, Sara) (Entered: 12/21/2022)
12/21/2022	<u>33</u>	MEMO ENDORSEMENT on re: <u>32</u> Letter, filed by African Communities Together, UndocuBlack Network, Haitian Bridge Alliance. ENDORSEMENT: The Parties' request to be excused from submitting a proposed discovery plan or exchanging initial disclosures is granted. The Parties shall submit a joint status letter by January 31, 2023. SO ORDERED. (Signed by Judge Edgardo Ramos on 12/21/2022) (tg) (Entered: 12/21/2022)
01/31/2023	<u>34</u>	JOINT LETTER addressed to Judge Edgardo Ramos from Counsel for Plaintiffs dated January 31, 2023 re: Status. Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network..(Dhanji, Sara) (Entered: 01/31/2023)
01/31/2023	<u>35</u>	MEMO ENDORSEMENT: on re: <u>34</u> Letter filed by African Communities Together, UndocuBlack Network, Haitian Bridge Alliance. ENDORSEMENT: The parties are directed to submit a joint status letter by no later than March 2, 2023. SO ORDERED. (Signed by Judge Edgardo Ramos on 1/31/2023) (ama) (Entered: 01/31/2023)

03/02/2023	<u>36</u>	JOINT LETTER addressed to Judge Edgardo Ramos from Counsel for Plaintiffs dated March 2, 2023 re: Status. Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network..(Dhanji, Sara) (Entered: 03/02/2023)
03/02/2023	<u>37</u>	MEMO ENDORSEMENT on re: <u>36</u> Letter filed by African Communities Together, UndocuBlack Network, Haitian Bridge Alliance. ENDORSEMENT: The parties are directed to submit a status letter no later than March 31, 2023. SO ORDERED. (Signed by Judge Edgardo Ramos on 3/2/2023) (va) (Entered: 03/02/2023)
03/31/2023	<u>38</u>	JOINT LETTER addressed to Judge Edgardo Ramos from Counsel for Plaintiffs dated March 31, 2023 re: Status. Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network..(Dhanji, Sara) (Entered: 03/31/2023)
04/07/2023	<u>39</u>	MEMO ENDORSEMENT on re: <u>38</u> Letter filed by African Communities Together, UndocuBlack Network, Haitian Bridge Alliance. ENDORSEMENT The parties' request to submit another joint letter to the Court by April 14, 2023 is granted. SO ORDERED. (Signed by Judge Edgardo Ramos on 4/7/2023) (jca) (Entered: 04/07/2023)
04/14/2023	<u>40</u>	JOINT LETTER addressed to Judge Edgardo Ramos from Counsel for Plaintiffs dated April 14, 2023 re: Status. Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network..(Hellgren, Tess) (Entered: 04/14/2023)
04/17/2023	<u>41</u>	MEMO ENDORSEMENT: on re: <u>40</u> Letter filed by African Communities Together, UndocuBlack Network, Haitian Bridge Alliance. ENDORSEMENT: The parties' request to submit another joint letter to the Court by April 24, 2023 is granted. SO ORDERED. (Signed by Judge Edgardo Ramos on 4/17/2023) (ama) (Entered: 04/17/2023)
04/24/2023	<u>42</u>	JOINT LETTER addressed to Judge Edgardo Ramos from Sarah Decker dated April 24, 2023 re: Status. Document filed by Haitian Bridge Alliance..(Decker, Sarah) (Entered: 04/24/2023)
04/25/2023	<u>43</u>	MEMO ENDORSEMENT: on re: <u>42</u> Letter filed by Haitian Bridge Alliance. ENDORSEMENT: The parties are directed to submit a final joint letter by May 3, 2023. SO ORDERED. (Signed by Judge Edgardo Ramos on 4/25/2023) (ama) (Entered: 04/25/2023)
05/03/2023	<u>44</u>	JOINT LETTER addressed to Judge Edgardo Ramos from Dana Walsh Kumar dated 05/03/2023 re: Status. Document filed by Federal Bureau of Prisons, U.S. Customs and Border Protection, U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement..(Kumar, Dana) (Entered: 05/03/2023)
05/12/2023	<u>45</u>	LETTER MOTION for Conference (<i>Pre-Motion Conference for Partial Summary Judgment Motion</i>) addressed to Judge Edgardo Ramos from AUSA Tomoko Onozawa dated May 12, 2023. Document filed by U.S. Customs and Border Protection, U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement. (Attachments: # <u>1</u> Exhibit A (October 2021 FOIA Request), # <u>2</u> Exhibit B (February 2022 FOIA Request), # <u>3</u> Exhibit C (May 2023 Proposal)).(Onozawa, Tomoko) (Entered: 05/12/2023)
05/12/2023	<u>46</u>	LETTER MOTION for Conference (<i>Pre-Motion Conference for Partial Summary Judgment Motion</i>) addressed to Judge Edgardo Ramos from Counsel for Plaintiffs dated May 12, 2023. Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network. (Attachments: # <u>1</u> Exhibit A (Plaintiffs' April 19, 2023 Redline), # <u>2</u> Exhibit B (Defendants' May 2, 2023 Redline)).(Dhanji, Sara) (Entered: 05/12/2023)
05/15/2023	<u>47</u>	ORDER with respect to <u>45</u> Letter Motion for Conference re: <u>45</u> LETTER MOTION for Conference (<i>Pre-Motion Conference for Partial Summary Judgment Motion</i>) addressed to Judge Edgardo Ramos from AUSA Tomoko Onozawa dated May 12, 2023. Both parties are directed to respond to the opposing parties' request for a pre-motion conference by May 19, 2023. A pre-motion conference is scheduled for May 23, 2023 at 11:30 a.m. The parties are instructed to dial (877) 411-9748 and enter access code 3029857# when prompted. SO ORDERED.. (Signed by Judge Edgardo Ramos on 5/15/2023) (rro) (Entered: 05/15/2023)

05/15/2023		Set/Reset Hearings: Telephone Conference set for 5/23/2023 at 11:30 AM before Judge Edgardo Ramos. (rro) (Entered: 05/15/2023)
05/17/2023	<u>48</u>	LETTER MOTION to Adjourn Conference addressed to Judge Edgardo Ramos from Sara Fatima Dhanji dated May 17, 2023. Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network..(Dhanji, Sara) (Entered: 05/17/2023)
05/19/2023	<u>49</u>	LETTER RESPONSE to Motion addressed to Judge Edgardo Ramos from Counsel for Plaintiffs dated May 19, 2023 re: <u>45</u> LETTER MOTION for Conference (<i>Pre-Motion Conference for Partial Summary Judgment Motion</i>) addressed to Judge Edgardo Ramos from AUSA Tomoko Onozawa dated May 12, 2023. . Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network. (Attachments: # <u>1</u> Exhibit A (Customs and Border Protection, After Action Report (AAR) (October 7, 2021))).(Dhanji, Sara) (Entered: 05/19/2023)
05/19/2023	<u>50</u>	LETTER RESPONSE to Motion addressed to Judge Edgardo Ramos from Dana Walsh Kumar dated 05/19/2023 re: <u>46</u> LETTER MOTION for Conference (<i>Pre-Motion Conference for Partial Summary Judgment Motion</i>) addressed to Judge Edgardo Ramos from Counsel for Plaintiffs dated May 12, 2023. . Document filed by Federal Bureau of Prisons, U.S. Customs and Border Protection, U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement..(Kumar, Dana) (Entered: 05/19/2023)
05/22/2023	51	ORDER granting <u>48</u> Letter Motion to Adjourn Conference. The May 23 pre-motion conference is adjourned to May 25, 2023 at 2:30 p.m. by telephone. The parties are reminded to dial (877) 411-9748 and enter access code 3029857# when prompted. (HEREBY ORDERED by Judge Edgardo Ramos)(Text Only Order) (jar) (Entered: 05/22/2023)
05/25/2023	52	Minute Entry for proceedings held before Judge Edgardo Ramos: Pre-Motion Conference held on 5/25/2023 by telephone. Plaintiff's and Defendant's counsel present. The parties are granted leave to file partial motions for summary judgment with the following briefing schedule: Government's moving papers due July 28, 2023; Plaintiff's cross-motion and response is due August 25, 2023; the response and reply due September 22, 2023; and reply due October 6, 2023. (jar) (Entered: 05/25/2023)
06/12/2023	<u>53</u>	NOTICE OF APPEARANCE by Michael Linhorst on behalf of African Communities Together, Haitian Bridge Alliance, UndocuBlack Network..(Linhorst, Michael) (Entered: 06/12/2023)
06/14/2023	<u>54</u>	MOTION for Sara Fatima Dhanji to Withdraw as Attorney . Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network. (Attachments: # <u>1</u> Exhibit Declaration of Sara Fatima Dhanji).(Dhanji, Sara) (Entered: 06/14/2023)
06/26/2023	<u>55</u>	TRANSCRIPT of Proceedings re: CONFERNECE held on 5/25/2023 before Judge Edgardo Ramos. Court Reporter/Transcriber: Kristen Carannante, (212) 805-0300. Transcript may be viewed at the court public terminal or purchased through the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER. Redaction Request due 7/17/2023. Redacted Transcript Deadline set for 7/27/2023. Release of Transcript Restriction set for 9/25/2023..(McGuirk, Kelly) (Entered: 06/26/2023)
06/26/2023	<u>56</u>	NOTICE OF FILING OF OFFICIAL TRANSCRIPT Notice is hereby given that an official transcript of a CONFERENCE proceeding held on 5/25/2023 has been filed by the court reporter/transcriber in the above-captioned matter. The parties have seven (7) calendar days to file with the court a Notice of Intent to Request Redaction of this transcript. If no such Notice is filed, the transcript may be made remotely electronically available to the public without redaction after 90 calendar days....(McGuirk, Kelly) (Entered: 06/26/2023)
07/28/2023	<u>57</u>	LETTER MOTION for Extension of Time <i>regarding Summary Judgment Briefing</i> addressed to Judge Edgardo Ramos from Dana Walsh Kumar dated 07/28/2023. Document filed by U.S. Customs and Border Protection, U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement..(Kumar, Dana) (Entered: 07/28/2023)

07/28/2023	<u>58</u>	ORDER: granting <u>57</u> Letter Motion for Extension of Time. The request for a two week extension, until August 11, 2023, to file the DHS Defendants' motion for partial summary judgment is granted. The briefing schedule outlined in the request is adopted. SO ORDERED. Cross Motions due by 9/15/2023. Motions due by 8/11/2023. (Signed by Judge Edgardo Ramos on 7/28/2023) (ama) (Entered: 07/28/2023)
07/28/2023		Set/Reset Deadlines: Responses due by 10/13/2023 Surreplies due by 10/27/2023. (ama) (Entered: 07/28/2023)
08/11/2023	<u>59</u>	MOTION for Partial Summary Judgment . Document filed by U.S. Customs and Border Protection, U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement..(Kumar, Dana) (Entered: 08/11/2023)
08/11/2023	<u>60</u>	MEMORANDUM OF LAW in Support re: <u>59</u> MOTION for Partial Summary Judgment . . Document filed by U.S. Customs and Border Protection, U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement..(Kumar, Dana) (Entered: 08/11/2023)
08/11/2023	<u>61</u>	DECLARATION of Fernando Pineiro in Support re: <u>59</u> MOTION for Partial Summary Judgment .. Document filed by U.S. Customs and Border Protection, U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement. (Attachments: # <u>1</u> Exhibit A – October 2021 FOIA Request, # <u>2</u> Exhibit B – February 2022 FOIA Request, # <u>3</u> Exhibit C – May 2 Proposal, # <u>4</u> Exhibit D – Plaintiffs' Proposal).(Kumar, Dana) (Entered: 08/11/2023)
08/11/2023	<u>62</u>	DECLARATION of Patrick Howard in Support re: <u>59</u> MOTION for Partial Summary Judgment .. Document filed by U.S. Customs and Border Protection, U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement. (Attachments: # <u>1</u> Exhibit A – October 2021 FOIA Request, # <u>2</u> Exhibit B – February 2022 FOIA Request, # <u>3</u> Exhibit C – May 2 Proposal, # <u>4</u> Exhibit D – Plaintiffs' Proposal).(Kumar, Dana) (Entered: 08/11/2023)
08/11/2023	<u>63</u>	DECLARATION of Catrina Pavlik–Keenan in Support re: <u>59</u> MOTION for Partial Summary Judgment .. Document filed by U.S. Customs and Border Protection, U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement. (Attachments: # <u>1</u> Exhibit A – October 2021 FOIA Request, # <u>2</u> Exhibit B – January 28, 2022 Letter, # <u>3</u> Exhibit C – February 2022 FOIA Request, # <u>4</u> Exhibit D – May 17, 2022 Letter, # <u>5</u> Exhibit E – May 2 Proposal, # <u>6</u> Exhibit F – Plaintiffs' Proposal).(Kumar, Dana) (Entered: 08/11/2023)
08/31/2023	<u>64</u>	MOTION for Lauren Michel Wilfong to Withdraw as Attorney . Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network. (Attachments: # <u>1</u> Affidavit of Lauren Michel Wilfong).(Wilfong, Lauren) (Entered: 08/31/2023)
09/08/2023	<u>65</u>	MOTION for Allison Crennen–Dunlap to Withdraw as Attorney . Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network. (Attachments: # <u>1</u> Exhibit Declaration of Allison Crennen–Dunlap).(Crennen–Dunlap, Allison) (Entered: 09/08/2023)
09/15/2023	<u>66</u>	CROSS MOTION for Partial Summary Judgment . Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network..(Linhorst, Michael) (Entered: 09/15/2023)
09/15/2023	<u>67</u>	MEMORANDUM OF LAW in Support re: <u>66</u> CROSS MOTION for Partial Summary Judgment . <i>and in Opposition to Defendants' Motion <u>59</u></i> . Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network..(Linhorst, Michael) (Entered: 09/15/2023)
09/15/2023	<u>68</u>	DECLARATION of Michael Linhorst in Support re: <u>66</u> CROSS MOTION for Partial Summary Judgment .. Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network. (Attachments: # <u>1</u> Exhibit A – October 2021 FOIA Request, # <u>2</u> Exhibit B – February 2022 FOIA Request, # <u>3</u> Exhibit C – CBP After Action Report, # <u>4</u> Exhibit D – February 10, 2023 Letter, # <u>5</u> Exhibit E – March 30, 2023 Letter, # <u>6</u> Exhibit F – April 12, 2023 Letter, # <u>7</u> Exhibit G – April 19, 2023 Proposal, # <u>8</u> Exhibit H – May 2, 2023 Proposal, # <u>9</u> Exhibit I – Post–Conference Email Exchanges).(Linhorst, Michael) (Entered: 09/15/2023)

09/21/2023	69	ORDER granting <u>54</u> Motion to Withdraw as Attorney. Attorney Sara Fatima Dhanji terminated. (HEREBY ORDERED by Judge Edgardo Ramos)(Text Only Order) (jar) (Entered: 09/21/2023)
10/13/2023	<u>70</u>	MEMORANDUM OF LAW in Opposition re: <u>66</u> CROSS MOTION for Partial Summary Judgment . <i>and in further support of <u>59</u> MOTION for Partial Summary Judgment.</i> Document filed by U.S. Customs and Border Protection, U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement..(Onozawa, Tomoko) (Entered: 10/13/2023)
10/13/2023	<u>71</u>	DECLARATION of Fernando Pineiro of ICE (Second Declaration) in Opposition re: <u>66</u> CROSS MOTION for Partial Summary Judgment .. Document filed by U.S. Customs and Border Protection, U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement..(Onozawa, Tomoko) (Entered: 10/13/2023)
10/13/2023	<u>72</u>	DECLARATION of Patrick Howard of CBP (Second Declaration) in Opposition re: <u>66</u> CROSS MOTION for Partial Summary Judgment .. Document filed by U.S. Customs and Border Protection, U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement..(Onozawa, Tomoko) (Entered: 10/13/2023)
10/13/2023	<u>73</u>	DECLARATION of Catrina Pavlik–Keenan of DHS (Second Declaration) in Opposition re: <u>66</u> CROSS MOTION for Partial Summary Judgment .. Document filed by U.S. Customs and Border Protection, U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement..(Onozawa, Tomoko) (Entered: 10/13/2023)
10/27/2023	<u>74</u>	REPLY MEMORANDUM OF LAW in Support re: <u>66</u> CROSS MOTION for Partial Summary Judgment . . Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network..(Linhorst, Michael) (Entered: 10/27/2023)
10/27/2023	<u>75</u>	DECLARATION of Michael Linhorst in Support re: <u>66</u> CROSS MOTION for Partial Summary Judgment .. Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network. (Attachments: # <u>1</u> Exhibit 1 – Email exchange).(Linhorst, Michael) (Entered: 10/27/2023)
02/07/2024	76	ORDER granting <u>64</u> Motion to Withdraw as Attorney. Attorney Lauren Michel Wilfong terminated. (HEREBY ORDERED by Judge Edgardo Ramos)(Text Only Order) (jar) (Entered: 02/07/2024)
02/07/2024	77	ORDER granting <u>65</u> Motion to Withdraw as Attorney. Attorney Allison Crennen–Dunlap terminated. (HEREBY ORDERED by Judge Edgardo Ramos)(Text Only Order) (jar) (Entered: 02/07/2024)
02/07/2024	<u>78</u>	OPINION & ORDER: re: <u>59</u> MOTION for Partial Summary Judgment filed by U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement, U.S. Customs and Border Protection, <u>66</u> CROSS MOTION for Partial Summary Judgment filed by African Communities Together, UndocuBlack Network, Haitian Bridge Alliance. For the foregoing reasons, the Court GRANTS the DHS Defendants motion for partial summary judgment as it pertains to the following: Requests No. 6 and 7 should not be added to the May 2023 Proposal; the DHS Defendants may exercise their discretion to craft reasonable search terms for responsive records with regard to Section D of the May 2023 Proposal; and the DHS Defendants need not employ Plaintiffs proposed record production schedule. Plaintiffs cross–motion for partial summary judgment is DENIED. The October 2021 Proposal is limited to the May 2023 Proposal, as modified by the DHS Defendants. The parties are directed to appear for a telephonic status conference on February 22, 2024 at 11:30 AM. The parties are directed to call (877) 411–9748 at that time and enter access code 3029857#. The Clerk of the Court is respectfully directed to terminate the motions, Docs. 59 and 66. IT IS SO ORDERED., (Telephonic Status Conference set for 2/22/2024 at 11:30 AM before Judge Edgardo Ramos.) (Signed by Judge Edgardo Ramos on 2/07/2024) (ama) (Entered: 02/07/2024)
02/16/2024	<u>79</u>	CONSENT LETTER MOTION to Adjourn Conference addressed to Judge Edgardo Ramos from Dana Walsh Kumar dated 02/16/2024. Document filed by Federal Bureau of Prisons, U.S. Customs and Border Protection, U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement..(Kumar, Dana) (Entered: 02/16/2024)

02/20/2024	<u>80</u>	ORDER: granting <u>79</u> Letter Motion to Adjourn Conference. The status conference is adjourned to February 29, 2024 at 11:30 a.m. The parties are reminded to call (877) 411-9748 and enter access code 3029857#. SO ORDERED.Telephonic Status Conference set for 2/29/2024 at 11:30 AM before Judge Edgardo Ramos. (Signed by Judge Edgardo Ramos on 2/20/2024) (ama) (Entered: 02/20/2024)
03/07/2024	<u>81</u>	PROPOSED STIPULATION AND ORDER. Document filed by Federal Bureau of Prisons, U.S. Customs and Border Protection, U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement..(Kumar, Dana) (Entered: 03/07/2024)
03/08/2024	<u>82</u>	STIPULATION AND ORDER REGARDING PROCESSING SCHEDULE: NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among Plaintiffs and the DHS Defendants as follows: By the last business day of each month, ICE shall review 750 pages of records for responsiveness and, if responsive, complete processing of those pages (i.e., release of non-exempt records or portions of records responsive to the FOIA Requests, notification to Plaintiff of the complete or partial withholding of records pursuant to any applicable FOIA exemption, or referral of records to other agencies or components for consultation) until ICE has completed its review and processing of all records identified in ICE's search that are responsive to the FOIA Requests; Within sixty days after the Court has entered this Stipulation and Order, and for every sixty days thereafter, the parties shall file a joint status report with the Court regarding the status of the case and the DHS Defendants' processing of responsive records (stating, at minimum, the number of pages reviewed by each of DHS, CBP, and ICE in the preceding sixty days, the number of pages produced by each during the same time period, and the number of pages remaining to be reviewed for potential production by each). and as set forth herein. By entering into this Stipulation and Order, the DHS Defendants do not concede that Plaintiffs are eligible for or entitled to attorneys' fees under 5 U.S.C. § 552(a)(4)(E), and the DHS Defendants reserve all defenses to any claim for attorneys' fees, and Plaintiffs do not waive any right to contest any aspect of Defendants' responses, including the adequacy of their searches or their complete or partial withholding of responsive records pursuant to any applicable FOIA exemption. SO ORDERED. (Signed by Judge Edgardo Ramos on 3/08/2024) (ama) (Entered: 03/08/2024)
04/12/2024	<u>83</u>	MOTION for Michael Linhorst to Withdraw as Attorney for Plaintiffs. Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network. (Attachments: # <u>1</u> Exhibit Declaration of Michael Linhorst).(Linhorst, Michael) (Entered: 04/12/2024)
05/03/2024	<u>84</u>	MOTION for Renee M. Griffin to Appear Pro Hac Vice . Filing fee \$ 200.00, receipt number ANYSDC-29309870. Motion and supporting papers to be reviewed by Clerk's Office staff. Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network. (Attachments: # <u>1</u> Affidavit Affidavit, # <u>2</u> Exhibit Certificate of Good Standing, # <u>3</u> Proposed Order Proposed Order).(Griffin, Renee) (Entered: 05/03/2024)
05/03/2024		>>>NOTICE REGARDING PRO HAC VICE MOTION. Regarding Document No. <u>84</u> MOTION for Renee M. Griffin to Appear Pro Hac Vice . Filing fee \$ 200.00, receipt number ANYSDC-29309870. Motion and supporting papers to be reviewed by Clerk's Office staff.. The document has been reviewed and there are no deficiencies. (bc) (Entered: 05/03/2024)
05/07/2024	<u>85</u>	STATUS REPORT. Document filed by U.S. Customs and Border Protection, U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement..(Onozawa, Tomoko) (Entered: 05/07/2024)
05/09/2024		ORDER granting <u>83</u> Motion to Withdraw as Attorney. Attorney Michael Linhorst terminated. (HEREBY ORDERED by Judge Edgardo Ramos)(Text Only Order) (jar) (Entered: 05/09/2024)
05/09/2024	<u>86</u>	ORDER granting <u>84</u> Motion for Renee M. Griffin to Appear Pro Hac Vice. (HEREBY ORDERED by Judge Edgardo Ramos)(Text Only Order) (jar) (Entered: 05/09/2024)
07/08/2024	<u>87</u>	STATUS REPORT. Document filed by U.S. Customs and Border Protection, U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement..(Kumar, Dana) (Entered: 07/08/2024)

08/28/2024	<u>88</u>	MOTION for Renee M. Griffin to Withdraw as Attorney <i>for Plaintiffs</i> . Document filed by African Communities Together, Haitian Bridge Alliance, UndocuBlack Network. (Attachments: # <u>1</u> Exhibit Declaration of Renee M. Griffin).(Griffin, Renee) (Entered: 08/28/2024)
09/06/2024	<u>89</u>	STATUS REPORT. Document filed by U.S. Customs and Border Protection, U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement..(Kumar, Dana) (Entered: 09/06/2024)
09/09/2024	90	ORDER granting <u>88</u> Motion to Withdraw as Attorney. Attorney Renee M. Griffin terminated. (HEREBY ORDERED by Judge Edgardo Ramos)(Text Only Order) (jar) (Entered: 09/09/2024)