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13 UNITED STATES DISTRICT COURT  
 14 NORTHERN DISTRICT OF CALIFORNIA  
 15 SAN FRANCISCO DIVISION

16 FARANGIS EMAMI, et al.,  
 17 Plaintiffs,  
 18 v.  
 19 KIRSTJEN NIELSEN, et al.,  
 20 Defendants.

Case No. 3:18-cv-01587-JD

**JOINT STIPULATION AND [PROPOSED]  
 ORDER FOR DEADLINES TO ANSWER  
 OR OTHERWISE RESPOND AND FOR  
 CONTINUING THE CASE MANAGEMENT  
 STATEMENT**

Judge: Hon. James Donato

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1 Pursuant to Civil Local Rule 7-12, the parties, by and through their respective counsel,  
2 hereby agree and stipulate as follows:

3 WHEREAS, on March 13, 2018, Plaintiffs filed their complaint (Dkt. 1) and service was  
4 completed on April 24;

5 NOW THEREFORE, the parties hereby agree and stipulate that:

6 1. The deadline for Defendants to answer or otherwise respond is set for September  
7 12, 2018.

8 2. The case management statement is due on September 15, 2018, and the initial  
9 case management conference is left unchanged for September 20, 2018.

10  
11 **IT IS SO STIPULATED.**

12 CHAD A. READLER  
13 Acting Assistant Attorney General  
14 United States Department of Justice, Civil Division

15 WILLIAM C. PEACHEY  
16 Director, Office of Immigration Litigation

17 WILLIAM C. SILVIS  
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19 STACEY I. YOUNG  
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21 By: /s/ P. Angel Martinez  
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/s/ Sirine Shebaya  
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**CIVIL LOCAL RULE 5-1(i)(3)**

Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from each of the signatories hereto.

/s/ P. Angel Martinez  
P. Angel Martinez

**[PROPOSED] ORDER**

Pursuant to stipulation, and for good cause shown, the Court hereby **ORDERS** that the deadline for Defendants to answer or otherwise respond is set for September 12, 2018; the case management statement is due on September 15, 2018, and the initial case management conference is left unchanged for September 20, 2018.

Dated: \_\_\_\_\_, 2018

\_\_\_\_\_  
Hon. James Donato  
United States District Judge  
for the Northern District of California

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15 SAN JOSE DIVISION

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18 v.  
19 KIRSTJEN NIELSEN, et al.,  
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Judge: Hon. James Donato

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1 I, P. Angel Martinez, declare as follows:

2 1. I am a trial attorney with the U.S Department of Justice, Civil Division, Office of  
3 Immigration Litigation, District Court Section, and counsel of record in this action for  
4 Defendants. I submit this Declaration pursuant to Local Rule 6-2 in support of the parties' Joint  
5 Stipulation and Request for an Order for Deadlines to Answer or Otherwise Respond and for  
6 Continuing the Case Management Statement. I have personal knowledge of the facts contained in  
7 this Declaration. If called upon to do so, I could and would testify competently thereto.

8 **A. REASONS FOR REQUESTED TIME CHANGE**

9 2. On July 29, 2018, Plaintiffs filed an amended complaint in light of the Supreme Court's  
10 recent decision in *Trump v. Hawaii*, 585 U.S. \_\_ (2018) and its impact on this case. It includes  
11 additional plaintiffs, plaintiffs from four new countries, and new types of visa applications.  
12 Because of the significant differences between the original and amended complaints, Defendants  
13 require further time to compile the information necessary to properly respond and work with  
14 various agencies to do so. The parties respectfully request that the deadline for Defendants to  
15 answer or otherwise respond be set for September 12, 2018; the case management statement be  
16 continued to September 15, 2018, and the initial case management conference be left unchanged  
17 on September 20, 2018.

18 **B. ALL PREVIOUS TIME MODIFICATIONS IN THE CASE**

19 3. There have been two modifications with respect to the deadline to answer or otherwise  
20 respond and to the date of the initial case management conference.

21 **C. EFFECT OF REQUESTED TIME MODIFICATION ON CASE SCHEDULE**

22 4. The requested time modification will postpone the deadlines to answer or otherwise  
23 respond and submit a case management statement by seven and two days, respectively, but leave  
24 unchanged the scheduled case management conference. It will ultimately allow the parties to  
25 pursue an efficient resolution of the case. The parties are committed to moving the case forward  
26 to a speedy and efficient resolution.

27 I declare under penalty of perjury under the laws of the United States that the foregoing is  
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1 true and correct.

2 Executed this 4th day of August, 2018, at Washington, D.C.

3 /s/ P. Angel Martinez

4 P. Angel Martinez

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