

1 CHAD A. READLER  
Acting Assistant Attorney General  
2 Civil Division  
WILLIAM C. PEACHEY  
3 Director  
Office of Immigration Litigation  
4 District Court Section  
WILLIAM C. SILVIS  
5 Assistant Director  
STACEY I. YOUNG  
6 Senior Litigation Counsel

7 P. ANGEL MARTINEZ (NYBN 5009790)  
Trial Attorney  
8 Office of Immigration Litigation  
District Court Section  
9 United States Department of Justice

10 P.O. Box 868, Ben Franklin Station  
Washington, DC 20044  
11 Telephone: (202) 598-8085  
Facsimile: (202) 305-7000  
12 Email: Angel.Martinez2@usdoj.gov

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

16 FARANGIS EMAMI, et al.,  
17 Plaintiffs,  
18 v.  
19 DONALD J. TRUMP, et al.,  
20 Defendants.

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

**JOINT STIPULATION AND [PROPOSED]  
ORDER FOR DEADLINES TO FILE AN  
AMENDED COMPLAINT AND ANSWER  
AND FOR CONTINUING THE INITIAL  
CASE MANAGEMENT CONFERENCE**

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 Plaintiffs to file an amended complaint is July 30, 2018.

7 2. The deadline for Defendants to file an answer is set for September 5, 2018.

8 3. The case management statement, initial case management conference, and other  
9 corresponding relevant deadlines, including meet and confer and joint status report deadlines, are  
10 postponed to at least a week after September 5, 2018.

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12 **IT IS SO STIPULATED.**

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

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

18 WILLIAM C. SILVIS  
19 Assistant Director

20 STACEY I. YOUNG  
21 Senior Litigation Counsel

22 By: /s/ P. Angel Martinez  
23 P. ANGEL MARTINEZ  
24 Trial Attorney (NYBN 5009790)  
25 U.S. Department of Justice, Civil Division  
26 Office of Immigration Litigation,  
27 District Court Section  
28 P.O. Box 868, Ben Franklin Station  
Washington, DC 20044  
T: (202) 598-8085  
F: (202) 305-7000  
Angel.Martinez2@usdoj.gov

*Attorneys for Defendants*

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/s/ Sirine Shebaya  
SIRINE SHEBAYA (*pro hac vice*)  
MUSLIM ADVOCATES  
P.O. Box 66408  
Washington, DC 20035  
Telephone: (202) 897-2622  
Facsimile: (202) 508-1007  
sirine@muslimadvocates.org

*Attorney for Plaintiffs*

**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 Plaintiffs to file an amended complaint is July 30, 2018; the deadline for Defendants to file an answer is set for September 5, 2018; and the case management statement, initial case management conference, and other corresponding relevant deadlines, including meet and confer and joint status report deadlines, are postponed to at least a week after September 5, 2018.

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

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

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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'  
5 Stipulation and Request for an Order for Deadlines to File an Amended Complaint and Answer  
6 and for Continuing the Case Management Statement and Initial Case Management Conference. I  
7 have personal knowledge of the facts contained in this Declaration. If called upon to do so, I  
8 could and would testify competently thereto.

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

10 2. Plaintiffs intend to file an amended complaint, in light of the Supreme Court's recent  
11 decision in *Trump v. Hawaii*, 585 U.S. (2018) and its impact on this case. The parties request  
12 that the deadline for Plaintiffs to file an amended complaint be set for July 30, 2018; the deadline  
13 for Defendants to file an answer be set for September 5, 2018; and the case management  
14 statement, initial case management conference, and other corresponding relevant deadlines,  
15 including meet and confer and joint status report deadlines, be postponed to at least a week after  
16 September 5, 2018.

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

18 3. There has been one modification with respect to the deadline to file an answer and to the  
19 date of the initial case management conference.

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

21 4. The requested time modification will enlarge the current schedule, but ultimately will  
22 allow the parties to pursue an efficient resolution of the case. The parties are committed to  
23 moving the case forward to a speedy and efficient resolution.

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

26 Executed this 19th day of July, 2018, at Washington, D.C.

27 /s/ P. Angel Martinez  
28 P. Angel Martinez