

1 This matter came on for a status hearing before the Court on February 25, 2011. In
2 preparation for the status hearing, the parties have conferred and agreed to a procedure intended to
3 streamline the resolution of the remaining issues in this lawsuit. In furtherance of this objective,
4 and with the goal of making the most efficient use of scarce judicial resources, the parties have
5 agreed to the following deadlines in this case. The parties jointly request that the Court adopt the
6 parties' proposed schedule.

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8	Defendants DHS/ICE complete search and production of all documents.	May 25, 2011
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10	Defendants DHS/ICE provide Plaintiff with a draft <i>Vaughn</i> index and a description of their searches.	July 1, 2011
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12	Plaintiff will inform DHS/ICE of the documents and redactions on which it would like to proceed to summary judgment.	August 8, 2011
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14	Defendants Secret Service, FBI, Criminal Division, DHS, and ICE move for summary judgment and file <i>Vaughn</i> indexes with the Court.	September 23, 2011
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16	Plaintiff files opposition and cross-moves for summary judgment.	October 21, 2011
17	Defendants file reply and opposition to Plaintiff's motion.	November 4, 2011
18	Plaintiff files reply in support of motion for summary judgment.	November 18, 2011
19	Oral argument.	December 9, 2011
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DATED: February 28, 2011

Respectfully submitted,

/s/ Jennifer Lynch
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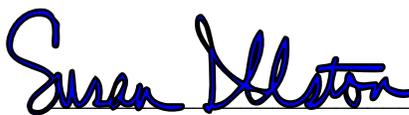
GENERAL ORDER NO. 45(X) CERTIFICATION

I attest that I have obtained Kimberly Herb's concurrence in the filing of this document.

/s/ Jennifer Lynch
Jennifer Lynch

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 2/28/11


Hon. Susan Ilston
United States District Judge