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15 Attorneys for Plaintiffs

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 18 UNITED STATES DISTRICT COURT
 19 NORTHERN DISTRICT OF CALIFORNIA
 20 SAN FRANCISCO DIVISION

21 UELIAN DE ABADIA-PEIXOTO, *et al.*,

22 Plaintiffs,

23 v.

24 UNITED STATES DEPARTMENT OF
 HOMELAND SECURITY, *et al.*,

25 Defendants.
 26
 27
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Case No.: 3:11-cv-4001 RS

CLASS ACTION

**JOINT STIPULATION AND
 [PROPOSED] ORDER REGARDING
 DEFENDANTS' MOTION**

5810233

JOINT STIPULATION AND [PROPOSED] ORDER RE DEF.' MOT.
 3:11-cv-4001 RS

1 Pursuant to Civil Local Rules 6-2 and 7-12, the parties, by and through their respective
2 undersigned counsel of record, hereby stipulate and agree, subject to this Court's approval, to
3 continue the hearing and briefing for Defendants' Motion for Relief from Nondispositive Pretrial
4 Order of Magistrate Judge ("Motion"; Dkt. No. 169).

5 WHEREAS, on September 6, 2013, defendants filed their Motion for relief from an order
6 to produce certain discovery with a hearing on October 10, 2013, any responses due by
7 September 20, 2013, and any replies due by September 27, 2013 (Dkt. No. 169);

8 WHEREAS, the parties have been engaged in extensive settlement negotiations;

9 WHEREAS, plaintiffs are scheduled to conduct a further telephonic settlement
10 conference with Magistrate Judge Beeler on September 24, 2013 (Dkt. No. 172) and the parties
11 are scheduled to conduct a further in-person settlement conference with her on October 2, 2013
12 (Dkt. No. 173);

13 WHEREAS, the parties seek to continue the briefing and hearing on defendants' Motion
14 in order to focus on settlement and avoid potentially unnecessary expenditure of party and
15 judicial resources on discovery disputes that may become moot if a negotiated settlement is
16 reached within the next several weeks; and

17 WHEREAS, the requested time modification would not affect the schedule for this case.

18 IT IS HEREBY STIPULATED AND AGREED, subject to approval of the Court, that
19 the hearing and briefing for the Motion are continued by approximately four (4) weeks as
20 follows: (1) the hearing on the Motion, if any, is continued to November 7, 2013 at 1:30 p.m. in
21 Courtroom 3, 17th Floor, San Francisco (or the Court's next available date thereafter); (2) any
22 responses are due by October 18, 2013; and (3) in the event replies are permitted, any replies are
23 due by October 25, 2013.

1 Dated: September 19, 2013

Respectfully submitted,

2 By: /s/ Angie Young Kim
3 Angie Young Kim

4 WILSON SONSINI GOODRICH & ROSATI
5 *Professional Corporation*
6 David J. Berger
7 Thomas J. Martin

8 LAWYERS' COMMITTEE FOR CIVIL
9 RIGHTS
10 Paul Chavez

11 AMERICAN CIVIL LIBERTIES UNION
12 FOUNDATION OF NORTHERN
13 CALIFORNIA, INC.
14 Julia Harumi Mass
15 Alan L. Schlosser

16 *Attorneys for Plaintiffs*

17 Dated: September 19, 2013

18 By: /s/ Erez Reuveni
19 Erez Reuveni

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SIGNATURE ATTESTATION


I, Angie Young Kim, attest that I obtained the concurrence of Erez Reuveni in filing this document. I declare under penalty of the laws of the United States that the foregoing is true and correct.

Executed this 19th day of September, 2013 in Palo Alto, California.

/s/ Angie Young Kim
Angie Young Kim

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 10/4/13



Honorable Richard Seeborg
United States District Judge