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11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA

14 AUDLEY BARRINGTON LYON, JR., et. al.,
 15
 16 Plaintiffs,
 17 v.
 18
 19 UNITED STATES IMMIGRATION AND
 20 CUSTOMS ENFORCEMENT, et al.,
 21 Defendants.

Case No.: 13-cv-05878 EMC

**JOINT STIPULATION REGARDING
 SCHEDULE AND PAGE LIMITS FOR
 BRIEFING ON CROSS MOTIONS FOR
 SUMMARY JUDGMENT; [~~PROPOSED~~]
 ORDER**

CLASS ACTION

1 The parties to this action hereby file this Joint Stipulation for an order to set the briefing
2 schedule and to seek expanded page limits for the parties' cross motions for summary judgment.

3 The parties seek leave of court to file expanded briefs in this matter for the following reasons:

- 4 • The case is factually complex. The claims are brought on behalf of a plaintiff class of
5 several hundred people who are housed at four separate facilities. The claims relate to
6 telephone access provided to immigration detainees at those facilities, which are served by
7 three different telephone companies. In addition, the operative facts have changed over the
8 course of litigation.
- 9 • The case is legally complex. Plaintiffs are challenging the adequacy of telephone access
10 provided by Defendants under statutory and constitutional provisions that have not
11 previously been applied to similar facts.
- 12 • The parties will seek partial summary judgment based on cross motions and will present
13 four rather than six briefs to the court. Because the Defendants' opening motion and
14 opposition and Plaintiffs' opposition and reply, respectively, will be combined, and
15 because of the complex facts and law presented, the parties' ability to present the issues
16 thoroughly to the Court would be constrained if limited to the typical page limitations.

17 Accordingly, the Parties propose the following briefing schedule and page limits:

18	19	Plaintiffs' Motion for Partial Summary Judgment	40 pages	December 16, 2015
20	20	Defendants' Opposition and Cross Motion for Summary Judgment	50 pages	January 5, 2016
21	21	Plaintiffs' Opposition and Reply	30 pages	January 21, 2016
22	22	Defendants' Reply	20 pages	January 28, 2016
23	23	Court Hearing on Cross Motions for Summary Judgment		February 11, 2016
24	24			
25	25			
26	26			
27	27			
28	28			

1 Dated: November 25, 2015

Respectfully submitted,

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By: /s/ Robert P. Varian
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Dated: November 25, 2015

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~~[PROPOSED]~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: 11/25/15

HON. EDWARD M. CHEN
United States District Judge



