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13	NORTHERN DISTRICT OF CALIFORNIA					
14						
15	SAN FRANCISCO DIVISION					
16						
17	AUDLEY BARRINGTON LYON, JR., et. al.,	Case No.: 13-cv-05878 EMC				
18	Plaintiffs,	JOINT STIPULATION REGARDING				
19		MODIFICATION TO SCHEDULE FOR				
20	v.	EXPERT DISCLOSURES AND BRIEFING ON CROSS MOTIONS FOR				
21		SUMMARY JUDGMENT;				
22		[PROPOSED] ORDER				
23	UNITED STATES IMMIGRATION AND					
24	CUSTOMS ENFORCEMENT, et al.,					
	Defendants.					
25						
26						
27						
28	_					
		IOINT STIPLILATION REFERRED DISCLOSURES				

The parties to this action hereby file this Joint Stipulation for an order modifying the deadlines for rebuttal expert disclosure and for Plaintiff's Motion for Summary Judgment by one day to accommodate the schedule of Defendants' rebuttal expert and mitigate any resulting prejudice to Plaintiffs. The current deadline for Rebuttal Expert Disclosure and Exchange of Rebuttal Expert Reports is December 10, 2015 (*see* ECF No. 96); the current deadline for Plaintiffs' Motion for Partial Summary Judgment is December 17, 2015 (*see* ECF No. 110). The Parties propose a one-day extension of those deadlines as follows:

Deadline for Disclosure of Rebuttal Experts	December 11, 2015
Plaintiffs' Motion for Partial Summary Judgment	December 17, 2015

1 2	Dated: December 7, 2015	AMERICAN CIVIL LIBERTIES UNION FOUNDATION OF NORTHERN CALIFORNIA
3		
4		By: /s/ Julia Harumi Mass
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JOINT STIPULATION RE: EXPERT DISCLOSURES AND MSJ BRIEFING SCHEDULE CASE NO.: 13-CV-05878 EMC

1 2 3	Dated: December 7, 2015  DISTRICT COURT S  OFFICE OF IMMIGS  CIVIL DIVISION	RATION LITIGATION		
4	U.S. DEPARTMENT	OF JUSTICE		
5	BENJAMIN C. MIZI	ER istant Attorney General		
6	6 WILLIAM C. PEAC	HEY		
7	Director			
8	0	ELIZABETH J. STEVENS		
9	9 Assistant Director			
10	By: /s/ Katherine	J. Shinners		
11	11 KATHERINI BRIAN C. W	E J. SHINNERS /ARD		
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16	16	erine.J.Shinners@usdoj.gov		
17	17 Attorneys For Defend	lants		
18	18			
19	19			
20		[PROPOSED] ORDER		
21	21 PURSUANT TO STIPULATION, IT IS SO ORDERED.	SDISTRICT		
22	22			
23	23 Date:	SO ORDERED .		
24	HON. EDW AND IT IS United States Dis	50 01e		
25	$\mathbb{Z}$	ge Edward M. Chen		
26	26 Jude	S Town		
27	27			
28	28	DISTRICT OF		

JOINT STIPULATION RE: EXPERT DISCLOSURES AND MSJ BRIEFING SCHEDULE CASE NO.: 13-CV-05878 EMC

## **CERTIFICATE OF SERVICE** No. 3:13-cv-05878-EMC I hereby certify that on this 21st Day of February 2014, a true and correct copy of the foregoing JOINT STIPULATION REGARDING MODIFICATION TO SCHEDULE FOR EXPERT DISCLOSURES AND BRIEFING ON CROSS MOTIONS FOR SUMMARY JUDGMENT was served with the Clerk of Court by using the CM/ECF system, which provided an electronic notice and electronic link of the same to all attorneys of record through the Court's CM/ECF system. /s/ Katherine J. Shinners Katherine J. Shinners Trial Attorney, District Court Section Office of Immigration Litigation Civil Division United States Department of Justice