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

20 AUDLEY BARRINGTON LYON, JR., et. al.,
 21 Plaintiffs,
 22 v.
 23 UNITED STATES IMMIGRATION AND
 24 CUSTOMS ENFORCEMENT, et. al.,
 25 Defendants.

Case No.: 13-cv-05878 EMC

**JOINT STIPULATION REGARDING
 REDACTION OF WITNESS NAMES
 EXCEPT INITIALS; [PROPOSED]
 ORDER**

[PURSUANT TO CIVIL L.R. 7-12]

CLASS ACTION

1 The Parties to this action hereby agree to the following regarding the redaction of the
2 names of certain declarants in this litigation as permitted by the Federal Rules of Civil Procedure
3 Rule 5.2(e). WHEREAS:

4 Many Plaintiff class members are seeking or have sought relief from removal based on
5 fear of persecution and in their home countries or based on other grounds that could subject them
6 to retaliation here or abroad;

7 Plaintiff class members seeking such relief may have statutory privacy rights to protect
8 them from harm. *See e.g.* 8 C.F.R. §§ 208.6, 1208.6 (regulations protecting an asylum-seeker's
9 right to confidentiality);

10 Plaintiff class members seek to submit declarations in support of Plaintiffs' motion for
11 summary judgment, some of which include references to statutorily protected claims for relief or
12 sensitive facts that create concern regarding harassment and retaliation; and

13 The Parties agree that protecting Plaintiff class members from potential harm related to
14 disclosure of their identities and the subject matter of their immigration cases can be achieved
15 without prejudice to Defendants by substituting initials for class member witnesses' full names
16 in the parties' briefs and evidentiary submissions.

17 NOW THEREFORE, the Parties stipulate that:

18 1. Papers and evidence filed in the public record will be redacted to reveal only
19 initials of Plaintiff class member witnesses who are not named representatives;

20 2. The names of class representatives will not be redacted;

21 3. In conjunction with Plaintiffs' Motion for Summary Judgment, Plaintiffs will file
22 under seal a reference list of the declarants' full names and corresponding initials, pursuant to
23 Fed. R. Civ. Pro. 5.2(g); and

24 4. The Parties need not file unredacted versions of the papers and evidence filed in
25 the public record in accordance with paragraph 1 under seal, serve unredacted versions of such
26 papers or evidence upon each other, or provide such unredacted versions as courtesy copies to
27 the Court.

1 THE PARTIES SO STIPULATE, THROUGH THEIR COUNSEL OF RECORD.

2
3 Dated: December 15, 2015

By: /s/ Julia Harumi Mass

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1 Dated: December 15, 2015

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19
20 **[~~PROPOSED~~] ORDER**

21
22 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

23 Dated: December 16, 2015



