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[Additional Counsel appear on signature page]

23 UNITED STATES DISTRICT COURT
 24 NORTHERN DISTRICT OF CALIFORNIA
 25 SAN FRANCISCO DIVISION

26 AUDLEY BARRINGTON LYON, JR., et. al.,
 27 Plaintiffs,
 28 v.
 UNITED STATES IMMIGRATION AND
 CUSTOMS ENFORCEMENT, et. al.,
 Defendants.

Case No. 13-cv-05878 EMC

**JOINT STIPULATION REGARDING
 SCHEDULE FOR J.H. DEPOSITION
 DESIGNATIONS; [PROPOSED]
 ORDER**

1 The parties respectfully submit this joint stipulation and proposed order concerning the
2 deadlines for the deposition designations for J.H., a member of the Plaintiff class who was
3 recently deported to the Philippines and is expected to be unavailable for trial. On March 17,
4 2016, the Court granted Plaintiffs' emergency request to depose J.H. to preserve his testimony,
5 given his then-impending deportation. See ECF No. 165; ECF No. 164. Pursuant to the Court's
6 order, the deposition of J.H. occurred on March 23, 2016, with questioning by counsel for both
7 Plaintiffs and Defendants. Plaintiffs requested expedited delivery of J.H's transcript, which was
8 delivered to all parties on March 29, 2016. Plaintiffs will submit J.H's deposition errata by no
9 later than April 4, 2016.

10 The trial in this case is schedule to being on May 23, 2016 and the Final Pretrial
11 Conference is scheduled for April 19, 2016. See ECF No. 96 (scheduling order); ECF No.107
12 (rescheduling Final Pretrial Conference to April 19, 2016). The Court's recent modification of
13 pretrial deadlines requires the joint pretrial conference statement to be filed by the Parties by
14 April 7, 2016. See No. 174. The Parties seek a slight modification of the pretrial deadlines with
15 respect to deposition designations for J.H., specifically:

16 April 8, 2016 – Parties to exchange deposition designations

17 April 13, 2016 – Parties to exchange any objections and counter-designations

18 April 15, 2016 – Parties to exchange responses to objections to designations and any
19 objections to counter-designations

20 April 18, 2016 – Plaintiffs to file the designations and objections
21 (by 9:00 a.m.)

22
23 Dated: April 1, 2016

By: /s/ Angélica Salceda
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1 Dated: April 1, 2016

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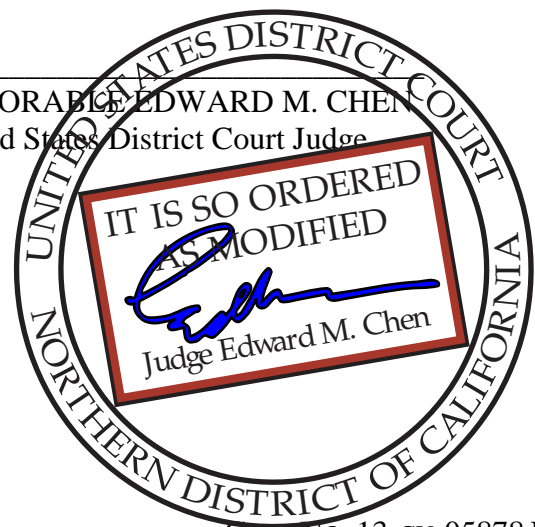
15 Attorneys for Defendants

16
17
18 ~~[PROPOSED]~~ ORDER

19
20 PURSUANT TO STIPULATION, IT IS SO ORDERED. (with modification on page 2 line
21 21).

22 Date: 4/4/16 _____

23 HONORABLE EDWARD M. CHEN
24 United States District Court Judge



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ATTESTATION OF CONCURRENCE IN JOINT FILING

Pursuant to Local Rule 5-1(i)(3)

I, Angélica H. Salceda, hereby attest that the other signatories listed here have concurred in the filing of this document.

Dated: April 1, 2016

/s/ Angélica H. Salceda
ANGÉLICA H. SALCEDA

CERTIFICATE OF SERVICE

No: 3:13-cv-05878 EMC

I hereby certify that on April 1, 2016, a true and correct copy of the foregoing **Joint Stipulation Regarding Schedule for J.H. Deposition Designations** was served with the Clerk of the 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.

Dated: April 1, 2016

/s/ Angélica H. Salceda
ANGÉLICA H. SALCEDA