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2	CHARLES J. HA (pro hac vice) DAVID KEENAN (pro hac vice)				
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14	Email: jmass@aclunc.org Attorneys for Plaintiffs				
15					
16	[Additional Counsel appear on signature page]				
10					
	UNITED STATES D NORTHERN DISTRIC				
18	SAN FRANCIS	CO DIVISION			
19					
20	AUDLEY BARRINGTON LYON, JR., et. al.,	Case No. 13-cv-05878 EMC			
21	Plaintiffs,	JOINT STIPULATION REGARDING			
22		SCHEDULE FOR FILING OF SETTLEMENT AGREEMENT AND			
23	v.	MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT			
24	UNITED STATES IMMIGRATION AND CUSTOMS ENFORCEMENT, et. al.,	AGREEMENT; [PROPOSED] ORDER			
25	Defendants.				
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	JOINT STIPULATION REGARDING SCHEDULE FOR FILING SETTLEMENT AGREEMENT AND MOTION FOR - 1 PRELIMINARY APPROVAL	- CASE NO. 13-CV-05878 EMC			

1	The parties respectfully submit this joint stipulation and proposed order concerning the		
2	schedule for submitting their settlement agreement for preliminary approval.		
3	Trial in this case was scheduled for May 23, 2016. On May 16, 2016, the parties reached		
4	an agreement in principle to settle the case, and the Court vacated the trial date. See ECF No. 256.		
5	The Parties have been diligently working to finalize their Settlement Agreement, which includes		
6	as Exhibits a proposed Final Order and proposed Preliminary and Final Notices to the Class.		
7	Plaintiffs also plan to file an unopposed Motion for Preliminary Approval of the Settlement		
8	Agreement.		
9	In order to finalize the language and details of the Settlement Agreement and Exhibits,		
10	obtain approval from Plaintiff Class Representatives and Defendants' representatives, and provide		
11	the Court with thorough briefing for the preliminary approval motion, the Parties propose the		
12	following schedule:		
13	• June 13, 2016: Plaintiffs file unopposed motion for preliminary approval of settlement		
14	agreement along with executed settlement agreement.		
15	• June 30, 2016: Hearing on Plaintiffs' motion for preliminary approval of settlement		
16	agreement.		
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	JOINT STIPULATION REGARDING SCHEDULE FOR FILING SETTLEMENT AGREEMENT AND MOTION FOR - 2 - CASE NO. 13-CV-05878 EMC PRELIMINARY APPROVAL		

1	Dated: June 1, 2016	ORRICK, HE	RRINGTON & SUTCLIFFE, LLP
2			
3		By:	<u>/s/ Robert P. Varian</u> ROBERT P. VARIAN (SBN 107459)
4	Dated: June 1, 2016	AMERICAN	CIVIL LIBERTIES UNION
5	······································	FOUN	IDATION OF NORTHERN FORNIA
6			
7		By:	/s/ Julia Harumi Mass
8			JULIA HARUMI MASS (SBN 189649)
			ANGÉLICA SALCEDA (SBN 296152) CHRISTINE P. SUN (SBN 218701)
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	Dated: June 1, 2016	AMERICAN	CIVIL LIBERTIES UNION
14	2 alcal valle 1, 2010		ONAL PRISON PROJECT
15			
1.0		By:	_/s/ Carl Takei
16			CARL TAKEI (SBN 256229)
17			915 15th Street, N.W., 7 th Floor
10			Washington, DC 20005
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19			Email: ctakei@aclu.org
20			
20	Dated: June 1, 2016		OUT, BRIGAGLIANO, &
21	Dated. Julie 1, 2010		TINGALE, LLP
22			<i>,</i>
23		By:	<u>/s/ Megan Sallomi</u> MEGAN SALLOMI (SBN 300580)
			MARC VAN DER HOUT (SBN 80778)
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25			San Francisco, CA 94104-4029
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26			Facsimile: (415) 981-3003
27		·	Email: msal@vblaw.com
28	Attorneys for Plaintiffs		
	JOINT STIPULATION REGARDING SCHEDULE FOR FILING SETTLEMENT AGREEMENT AND MOTION I PRELIMINARY APPROVAL	for - 3 -	CASE NO. 13-CV-05878 EMC

1	Dated: June 1, 2016	DISTRICT COURT SECTION OFFICE OF IMMIGRATION LITIGATION
2		CIVIL DIVISION U.S. DEPARTMENT OF JUSTICE
3 4		BENJAMIN C. MIZER Principal Deputy Assistant Attorney General
5		WILLIAM C. PEACHEY
5 6		Director
7		ELIZABETH J. STEVENS Assistant Director
8		
9		By: <u>/s/ Katherine J. Shinners</u> KATHERINE J. SHINNERS BRIAN C. WARD
10		JENNIFER A. BOWEN
11		COLIN KISOR Trial Attorneys
12		P.O. Box 868, Ben Franklin Station Washington, D.C. 20044
13		Telephone: (202) 598-8259 Facsimile (202) 305-7000
14		Email: Katherine.J.Shinners@usdoj.gov
15		Attorneys for Defendants
16		
17		
18		
19		
20	[PROPØSED] ORDER	
21	PURSUANT TO STIPULATION, IT IS S	O ORDERED.
22	6/3/16	
23	Date:	Hon. Edward M Chen
24		Hon. Edward M Chen United State Di IT IS SO ORDERED
25		E Contraction E
26		Judge Edward M. Chen
27		
28		VDISTRICT OF C
	JOINT STIPULATION REGARDING SCHEDULE FOR FILING SETTLEMENT AGREEMENT AND MOTION FOR PRELIMINARY APPROVAL	- 4 - Case No. 13-cv-05878 EMC

1 2	ATTESTATION OF CONCURRENCE IN JOINT FILING Pursuant to Local Rule 5-1 (i)(3)			
3				
4	I, Julia Harumi Mass, hereby attest that the other signatories listed here have concurred in			
5	the filing of this document.			
6				
7	Dated: June 1, 2016 By: <u>/s/ Julia Harumi Mass</u>			
8	JULIA HARUMI MASS (SBN 189649)			
9				
10				
11				
12	CERTIFICATE OF SERVICE			
13	No: 3:13-cv-05878 EMC			
14	I hereby certify that on June 1, 2016, a true and correct copy of the foregoing Joint			
15	Stipulation Regarding Schedule for Filing Settlement Agreement and Motion for Preliminary			
16	Approval was served with the Clerk of the Court by using the CM/ECF system, which provided			
17	an electronic notice and electronic link of the same to all attorney of record through the Court's			
18	CM'ECF system.			
19				
20				
21	Dated: June 1, 2016 By: <u>/s/ Julia Harumi Mass</u>			
22	JULIA HARUMI MASS (SBN 189649)			
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	JOINT STIPULATION REGARDING SCHEDULE FOR FILING SETTLEMENT AGREEMENT AND MOTION FOR - 5 - CASE NO. 13-CV-05878 EMC PRELIMINARY APPROVAL			