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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 FILING OF
 SETTLEMENT AGREEMENT AND
 MOTION FOR PRELIMINARY
 APPROVAL OF SETTLEMENT
 AGREEMENT; [~~PROPOSED~~] ORDER**

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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Dated: June 1, 2016

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By: /s/ Robert P. Varian
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Dated: June 1, 2016

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Dated: June 1, 2016

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[~~PROPOSED~~] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: 6/3/16

Hon. Edward M. Chen
United States District Court



