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Lyon et al v. U.S. Immigration and Customs Enforcement et al

1	Based on the Declaration of Julia Harumi Mass filed herewith, the Parties in the above-
2	captioned matter hereby file this Joint Stipulation to voluntarily dismiss Lourdes Hernandez-
3	Trujillo as a named Plaintiff in this action as permitted by the Federal Rules of Civil Procedure
4	Rule 41(a)(1)(A)(ii).
5	
6	THE PARTIES SO STIPULATE, THROUGH THEIR COUNSEL OF RECORD.
7	Dated: April 6, 2015 ORRICK, HERRINGTON & SUTCLIFFE LLP
8	ROBERT P. VARIAN (SBN 107459)
	CHARLES J. HA (WA Bar No. 34430 (pro hac vice))
9	DAVID KEENAN (WA Bar No. 41359 (pro hac vice))
10	CHRISTINE M. SMITH (SBN 267929) JUDY KWAN (SBN 273930)
11	ALEXIS YEE-GARCIA (SBN 277204)
12	MATTHEW R. KUGIZAKI (SBN 286795)
	JAYA KASIBHATLA (NY Bar No. 5208087 (pro hac vice))
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14	AMERICAN CIVIL LIBERTIES UNION NATIONAL PRISON PROJECT
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20	AMERICAN CIVIL LIBERTIES UNION FOUNDATION OF NORTHERN CALIFORNIA
21	Pvy /s/ Julia Harumi Mass
22	By: <u>/s/ Julia Harumi Mass</u> JULIA HARUMI MASS (SBN 189649)
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27	Attorneys for Plaintiffs
28	

1 Dated: April 6, 2015 OFFICE OF IMMIGRATION LITIGATION, CIVIL DIVISION 2 U.S. DEPARTMENT OF JUSTICE 3 STUART DELERY **Assistant Attorney General** 4 5 WILLIAM C. PEACHEY Director, District Court Section 6 ELIZABETH J. STEVENS 7 Assistant Director, District Court Section 8 By: /s/ Katherine J. Shinners 9 JENNIFER A. BOWEN Trial Attorney, District Court Section 10 KATHERINE A. SMITH Trial Attorney 11 KATHERINE J. SHINNERS 12 Trial Attorney, District Court Section P.O Box 868, Ben Franklin Station 13 Washington, D.C. 20044 Telephone: (202) 616-3558 14 Email: Jennifer.bowen@usdoj.gov 15 Attorneys for Defendants 16 17 [PROPOSED] ORDER 18 19 PURSUANT TO STIPULATION, IT IS SO ORDERED. 20 IT IS SO ORDERED 21 April 7, 2015 22 Dated: _ 23 Edward M. Chen 24 25 26 27 28

CERTIFICATION OF CONCURRENCE FROM OTHER PARTIES

Dated: April 6, 2015

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I, Julia Harumi Mass, am the ECF user whose ID and password are being used to file this Joint Stipulation of Voluntary Dismissal of Lourdes Hernandez-Trujillo and Proposed Order (ECF NO. 83). In compliance with General Order 45, X.B., I hereby certify that each of the other signatories has concurred in the filing of this document and has authorized the use of his/her electronic signature.

/s/ Julia Harumi Mass_

JULIA HARUMI MASS AMERICAN CIVIL LIBERTIES UNION FOUNDATION OF NORTHERN CALIFORNIA 39 Drumm Street San Francisco, CA 94111

-3.