

1 ALEX G. TSE (CABN 152348)  
 Acting United States Attorney  
 2 SARA WINSLOW (DCBN 457643)  
 Chief, Civil Division  
 3 WENDY M. GARBERS (CABN 213208)  
 Assistant United States Attorney  
 4 DAVID A. PEREDA (CABN 237982)  
 Assistant United States Attorney  
 5  
 6 450 Golden Gate Avenue, Box 36055  
 San Francisco, California 94102-3495  
 Telephone: (415) 436-6475  
 7 FAX: (415) 436-7234  
 wendy.garbers@usdoj.gov  
 8

9 Attorneys for Defendant SECRETARY OF  
 THE DEPARTMENT OF HOMELAND  
 SECURITY  
 10

11 UNITED STATES DISTRICT COURT  
 12 NORTHERN DISTRICT OF CALIFORNIA  
 13 SAN FRANCISCO DIVISION

14 K. H., C.V., W.L., J.M., JEFFREY BOYER,  
 15 BRIAN PIEROG, DONNA BAXTER,  
 RICHARD DEVIVO, and GARY  
 16 MCCONAGHY, on behalf of themselves and  
 those similarly situated,  
 17

18 Plaintiffs,

19 v.

20 THE SECRETARY OF THE DEPARTMENT  
 OF HOMELAND SECURITY,  
 21

Defendant.

Case No. 15-cv-02740 JST

**STIPULATION AND ~~PROPOSED~~ ORDER RE  
 SETTLEMENT AND VACATING DEADLINES**

The Honorable Jon S. Tigar

**STIPULATION**

24 WHEREAS, on February 23, 2018, the parties participated in an all-day settlement conference led  
 25 by Magistrate Judge Laurel Beeler;

26 WHEREAS, the parties reached a global settlement of the action subject to necessary governmental  
 27 approvals;

28 WHEREAS, the settlement was put on the record;

1 WHEREAS, the parties also contemplate preparing a written settlement agreement, which will be  
2 signed by all opt-in plaintiffs; and

3 WHEREAS, the parties estimate that it will take about 60 days to document the settlement and  
4 obtain the requisite governmental approvals;

5 IT IS HEREBY STIPULATED, by the parties to the above-captioned action, by and through their  
6 respective counsel of record, that:

- 7 1. All deadlines and other dates currently on calendar are vacated; and  
8 2. Within 60 days, the parties will file a joint statement reporting on the status of finalizing the  
9 settlement.

10 DATED: February 28, 2018

Respectfully submitted,

11 ALEX G. TSE  
12 Acting United States Attorney

13 /s/ Wendy M. Garbers  
14 WENDY M. GARBERS  
15 Assistant United States Attorney  
Attorneys for Defendant

16 DATED: February 28, 2018

CLARK HILL PLLC

17 /s/ Nicholas M. Wieczorek \*  
18 NICHOLAS M. WIECZOREK  
Attorneys for Plaintiffs

19 \*In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty of perjury  
20 that all signatories have concurred in the filing of this document.

21 ~~PROPOSED~~ ORDER

22  
23 Pursuant to the parties' settlement and stipulation, IT IS SO ORDERED.

24  
25 Dated: March 1, 2018

26  
27   
28 THE HONORABLE JON S. TIGAR