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Attorneys for Defendant SECRETARY OF
THE DEPARTMENT OF HOMELAND
SECURITY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

K.H., on behalf of himself and those similarly
situated,

Plaintiff,

v.

THE SECRETARY OF THE DEPARTMENT
OF HOMELAND SECURITY,

Defendant.

Case No. 15-cv-02740 JST

**JOINT PROPOSAL REGARDING SCHEDULE
AND ~~PROPOSED~~ ORDER**

The Honorable Jon S. Tigar

Pursuant to the Court's instruction, the parties to the above-captioned action jointly submit the
proposed case schedule, through the class certification hearing:

<u>SCHEDULE EVENT</u>	<u>DATE</u>
Start of Fact Discovery	December 1, 2015
Deadline for Plaintiff to File Amended Complaint	January 15, 2016
Defendant's Response to Amended Complaint Due	February 15, 2016
Telephonic Further Case Management Conference	April 27, 2016, at 2:00 p.m.
Plaintiff's Disclosures Re Class Cert Experts Due (FRCP 26(a)(2))	May 2, 2016

JOINT PROPOSAL REGARDING SCHEDULE AND ~~PROPOSED~~ ORDER
NO. 15-CV-02740 JST

1	Defendant's Disclosures Re Class Cert Experts Due (FRCP 26(a)(2))	July 1, 2016
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3	Deadline for Class Cert Expert Depositions	September 1, 2016
4	Filing Deadline for Plaintiff's Class Certification Motion (under seal, redacted version filed within 30 days) ¹	October 6, 2016
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6	Filing Deadline for Defendant's Class Certification Opposition (under seal, redacted version filed within 30 days)	November 3, 2016
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8	Filing Deadline for Plaintiff's Class Certification Reply (under seal, redacted version filed within 30 days)	December 1, 2016
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10	Hearing on Class Certification Motion	December 15, 2016 at 2:00 p.m.

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12 DATED: November 23, 2015

Respectfully submitted,

13 BRIAN J. STRETCH
Acting United States Attorney

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

17 DATED: November 23, 2015

MORRIS POLICH & PURDY LLP

18
19 /s/ Nicholas M. Wieczorek *
20 NICHOLAS M. WIECZOREK
Attorneys for Plaintiff

21 *In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty of perjury
22 that plaintiff has concurred in the filing of this document.

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25 ¹ Many of the documents regarding the Federal Air Marshal Service's operations contain
26 Sensitive Security Information ("SSI"), as defined by federal regulation, 49 C.F.R. § 1520.5. TSA has a
27 SSI Program Office that reviews court filings for SSI redaction. See generally 49 C.F.R. § 1520.5.
28 Otherwise, "records containing SSI are not available for public inspection or copying." 49 C.F.R.
§ 1520.15. In order to protect this SSI, the parties request that they initially be permitted to file their
class certification briefing under seal. Both sides' briefs will then be reviewed by the SSI Program
Office for redactions, and publicly-available versions filed within 30 days.

1 **~~[PROPOSED]~~ ORDER**

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3 Pursuant to the parties' joint proposal, IT IS SO ORDERED.

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5 Dated: November 30, 2015

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9 THE HONORABLE JON S. TIGAR

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