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13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 OAKLAND DIVISION

16 ASIAN LAW CAUCUS,)	CASE NO. 13-1593 SBA
)	
17 Plaintiff,)	STIPULATION TO EXTEND DEADLINES FOR
)	DISPOSITIVE MOTIONS
18 v.)	
)	Hon. Sandra B. Armstrong
19 UNITED STATES IMMIGRATION AND)	
20 CUSTOMS ENFORCEMENT; UNITED)	
21 STATES DEPARTMENT OF HOMELAND)	
SECURITY,)	
)	
22 Defendants.)	
)	

23

24 The parties by and through their counsel of record, hereby stipulate and agree as follows:

25 1. On August 30, 2013, the Court set the following briefing schedule for summary judgment in the

26 above-captioned case:

27 Plaintiff’s motion for summary judgment due: December 10, 2013

28 Defendants’ consolidated opposition/cross-motion for summary judgment due: January 7, 2014

1 Plaintiff's consolidated reply/opposition to defendants' cross-motion for summary judgment due:
2 January 21, 2014

3 Defendants' reply in support of cross-motion for summary judgment due: January 28, 2014

4 Hearing on parties' cross-motions for summary judgment: February 25, 2014 at 1:00 p.m.

5 2. The federal government shutdown from October 1 through October 16, 2013 has delayed
6 defendant U.S. Immigration and Customs Enforcement's (hereinafter, "ICE") expected
7 production of documents in response to the Freedom of Information Act ("FOIA") requests at
8 issue. During the lapse in government appropriations, undersigned counsel for the defendant as
9 well as ICE employees involved in the processing of the agency's response to the FOIA requests
10 at issue were furloughed.

11 3. The parties believe that ICE's document production will dispose of the issues in this case, or
12 narrow the issues for summary judgment. Accordingly, to allow ICE sufficient time to complete
13 its production of documents prior to the deadlines for the parties' cross-motions for summary
14 judgment, the parties respectfully request that the dispositive motions schedule be extend as
15 follows:

16 Plaintiff's motion for summary judgment due: February 18, 2014

17 Defendants' consolidated opposition/cross-motion for summary judgment due: March 11, 2014

18 Plaintiff's consolidated reply/opposition to defendants' cross-motion for summary judgment due:
19 March 25, 2014

20 Defendants' reply in support of cross-motion for summary judgment due: April 1, 2014

21 Hearing on parties' cross-motions for summary judgment: May 6, 2014, at 1:00 p.m.

22 IT IS SO STIPULATED.

23
24 DATED: November 19, 2013

Respectfully submitted,
MELINDA HAAG
United States Attorney

26 /s/ Jennifer S Wang
27 JENNIFER S WANG
Assistant United States Attorney

1 DATED: November 19, 2013

National Day Laborer Organizing Network

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3 /s/ Jessica Karp
4 JESSICA KARP
Attorneys for Plaintiff Asian Law Caucus

5 ORDER

6 Pursuant to the parties' stipulation and good cause having been shown, it is hereby ordered that
7 the deadlines for the parties' cross-motions for summary judgment are hereby extended as follows:

8 Plaintiff's motion for summary judgment due: February 18, 2014

9 Defendants' consolidated opposition/cross-motion for summary judgment due: March 11, 2014

10 Plaintiff's consolidated reply/opposition to defendants' cross-motion for summary judgment due:
11 March 25, 2014

12 Defendants' reply in support of cross-motion for summary judgment due: April 1, 2014

13 The parties' cross-motions for summary judgment will be heard on May 6, 2014, at 1:00 p.m.

14 IT IS SO ORDERED.

15
16 
17 SAUNDRA BROWN ARMSTRONG
United States District Judge