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13 Attorney for Plaintiff

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

17 ASIAN LAW CAUCUS,	)	CASE NO. 13-1593 SBA
18	)	
19 Plaintiff,	)	<b>STIPULATION TO CONTINUE CASE</b>
	)	<b>MANAGEMENT CONFERENCE</b>
20 v.	)	
	)	Hon. Sandra B. Armstrong
21 UNITED STATES IMMIGRATION AND	)	
22 CUSTOMS ENFORCEMENT; UNITED	)	
STATES DEPARTMENT OF HOMELAND	)	
SECURITY,	)	
23 Defendants.		

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25 Subject to the approval of the Court, the undersigned parties hereby stipulate that the telephonic  
 26 case management conference currently set for September 18, 2014 at 2:30 p.m., be continued until  
 27 October 2, 2014 at 2:30 p.m., and that the parties' deadline to submit a joint case management statement  
 28 be extended from September 11, 2014 until September 25, 2014.

1 Plaintiff has sued defendant, United States Immigration and Customs Enforcement (“ICE”), for  
2 alleged violation of the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552. In the parties’ last Joint  
3 Case Management Statement, filed on June 19, 2014, the parties informed the Court that ICE agreed to  
4 conduct several searches described in the parties’ February 25, 2014 stipulation (*see* ECF No. 33), and  
5 that ICE had begun a rolling production of documents.

6 ICE completed its production on August 29, 2014. At this time, the parties anticipate that the  
7 issues in this case will be challenges to the withholdings/exemptions under the FOIA claimed by  
8 defendant in productions made from the searches described in the parties’ February 25, 2014 stipulation,  
9 and that those challenges will be resolved on summary judgment.

10 The parties request a short continuance of the case management conference because plaintiff is  
11 currently in the process of reviewing documents provided by defendant to determine what, if any,  
12 withholdings/exemptions plaintiff intends to challenge. Plaintiff expects to complete its review by  
13 September 22, 2014. Accordingly, the parties respectfully request that the telephonic case management  
14 conference currently set for September 18, 2014 at 2:30 p.m., be continued to October 2, 2014 at 2:30  
15 p.m. to allow the parties additional time to determine what, if any, issues remain for summary judgment.

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17 DATED: September 10, 2014

Respectfully submitted,  
MELINDA HAAG  
United States Attorney

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19 /s/  
JENNIFER S WANG  
Assistant United States Attorney

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22 DATED: September 10, 2014

National Day Laborer Organizing Network

23 /s/\_\_\_\_\_  
JESSICA KARP BANSAL  
Attorneys for Plaintiff Asian Law Caucus


24  
25 ORDER

26 Pursuant to the parties’ stipulation and good cause having been shown, it is hereby ordered that  
27 the telephonic case management conference currently set for September 18, 2014 at 2:30 p.m. is  
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1 continued to October 2, 2014 at 2:30 p.m. The parties will file a case management statement by  
2 September 25, 2014.

3 IT IS SO ORDERED.

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LAUNDRA BROWN ARMSTRONG  
United States District Judge