

1 BRIAN STRETCH (CABN 163973)
 United States Attorney
 2 SARA WINSLOW (DCBN 457643)
 Chief, Civil Division
 3 KIMBERLY FRIDAY (MABN 660544)
 Deputy Chief, Civil Division
 4 Assistant United States Attorney
 450 Golden Gate Avenue, Box 36055
 5 San Francisco, California 94102-3495
 Telephone: (415) 436-7102
 6 FAX: (415) 436-7169
 kimberly.friday@usdoj.gov
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Attorneys for Defendants

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 9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 OAKLAND DIVISION

12	LAWYERS' COMMITTEE FOR CIVIL)	CIVIL ACTION NO. 16-CV-0544 KAW
13	RIGHTS OF THE SAN FRANCISCO BAY)	
14	AREA; CENTER FOR GENDER & REFUGEE))	
15	STUDIES; COMMUNITY LEGAL SERVICES))	JOINT REQUEST TO VACATE CASE
16	IN EAST PALO ALTO; AMERICAN)	MANAGEMENT CONFERENCE AND EXTEND
17	IMMIGRATION LAWYERS ASSOCIATION,)	DATE FOR RESPONSIVE PLEADING;
18)	[PROPOSED] ORDER
19	Plaintiffs,)	
20)	
21	v.)	
22)	CMC Date: October 25, 2016, 1:30 p.m.
23	EXECUTIVE OFFICE FOR IMMIGRATION)	1301 Clay Street
24	REVIEW; UNITED STATES DEPARTMENT)	Oakland, CA 94612
25	OF JUSTICE,)	
26)	
27	Defendants.)	
28)	

22 The parties, through their undersigned attorneys, have cooperatively worked towards settlement
 23 of this Freedom of Information Act action and anticipate that it will be resolved in the next few weeks.
 24 Defendants have made several productions of agency records and have only one request for information
 25 that remains outstanding. Defendants are working diligently to complete their production of agency
 26 records in response to this request, and anticipate that they will be able to complete production by the
 27 end of the month. Accordingly, the parties hereby stipulate and request pursuant to Civ. L.R. 6-2 and 7-
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1 12 that: (1) the Case Management Conference currently scheduled for October 25, 2016, at 1:30 p.m. be
2 vacated; and (2) the Government's deadline to file a responsive pleading be extended to November 30,
3 2016. The Court has reset the Case Management Conference and Answer date on two prior occasions,
4 and the parties have stipulated to three one-month extensions of the Answer date as they continue to
5 collaboratively work to resolve this matter.

6 At this time, Defendants believe that production will be completed in October, but the parties
7 will need additional time to negotiate Plaintiffs' request for attorneys' fees. Defendants' responsive
8 pleading is currently due on October 31, 2016. The parties will work towards completing the remaining
9 production and resolving the request for attorneys' fees in time to file a stipulated dismissal of the case
10 by November 30, 2016. The parties will notify the Court if additional time is needed to resolve the case.
11 If any party subsequently determines that a Case Management Conference is necessary, that party will
12 notify the Court.

13 A proposed order is attached.

15 Respectfully submitted,

16 BRIAN J. STRETCH
17 United States Attorney

18 Dated: October 11, 2016

By:

/s/ Kimberly Friday
19 KIMBERLY FRIDAY
Assistant United States Attorney
20 Counsel for the Defendants

21 Dated: October 11, 2016

By:

/s/ Patrick Ferguson
22 PATRICK FERGUSON
Davis Wright Tremaine LLP
23 Counsel for Plaintiffs

1 **CERTIFICATION**

2 Pursuant to Local Rule 5-1(i)(3), the undersigned hereby attests that I have conferred with
3 Patrick Ferguson, counsel for plaintiffs, regarding this filing. Mr. Ferguson has represented that he
4 concurs in the filing of this document and that I am authorized to file it on his behalf.

5 BRIAN J. STRETCH
6 United States Attorney

7 Dated: October 11, 2016

8 By: /s/ Kimberly Friday
9 KIMBERLY FRIDAY
10 Assistant United States Attorney
11 Counsel for the Defendants

12 **[PROPOSED] ORDER**

13 Pursuant to stipulation, it is so ordered that the Case Management Conference currently set for
14 October 25, 2016, is hereby vacated. Defendants' responsive pleading is due November 30, 2016.

15 **SO ORDERED.**

16 DATED: 10/18/16

17 Kandis Westmore
18 HONORABLE KANDIS A. WESTMORE
19 UNITED STATES MAGISTRATE JUDGE
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