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7 Attorneys for Defendant

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

12 THE CENTER FOR INVESTIGATIVE	)	CASE NO. 4:21-CV-09633-HSG
REPORTING, et al.,	)	
13 Plaintiffs,	)	<b>STIPULATED REQUEST TO CONTINUE CASE</b>
	)	<b>MANAGEMENT CONFERENCE AND ORDER</b>
14 v.	)	<b>(as modified)</b>
	)	Date: May 17, 2022
15 DEPARTMENT OF HOMELAND	)	Time: 2:00pm
SECURITY,	)	Location: Telephonically
16 Defendant.	)	
	)	

18  
 19 Plaintiffs The Center for Investigative Reporting and Ike Sriskandarajah (“Plaintiffs”) and  
 20 Defendant United States Department of Homeland Security, Immigration and Customs Enforcement  
 21 (“Defendant”), by and through their undersigned counsel, submit this stipulation pursuant to Local Civil  
 22 Rule 6-2 to continue the case management conference set for May 17, 2022 to June 28, 2022, or a  
 23 subsequent date convenient to the Court. This stipulation is based on the following facts:

- 24 1. This action, filed on December 14, 2021, arises out of a Freedom of Information Act  
 25 (“FOIA”) request submitted by Plaintiffs to Defendant. The parties have engaged in  
 26 cooperative and productive communications regarding the FOIA request and the search  
 27 for and release of responsive documents. ICE made an initial production on April 14,  
 28 2022 and continues its review pursuant to the parties’ agreed-upon processing schedule.

- 1 2. To allow time for additional processing of documents, for Plaintiffs to review  
2 productions, and for the parties to resolve as many issues in this matter as possible  
3 between themselves, the parties stipulate and request that the case management  
4 conference currently scheduled for May 17, 2022 be continued to June 28, 2022. The  
5 parties will provide the Court with a joint status report by June 21, 2022. At that time,  
6 the parties may request a further continuance of the case management conference, or, if  
7 the need arises, request to appear at the case management conference.
- 8 3. The parties respectfully submit that this is the most efficient manner in which to proceed  
9 and will conserve both the parties' and the Court's resources.

10 Respectfully submitted,

11 STEPHANIE M. HINDS  
12 United States Attorney

13 Dated: May 9, 2022

13 By: /s/ Sapna Mehta  
14 SAPNA MEHTA  
15 Assistant United States Attorney  
16 Attorney for Defendant

16 Dated: May 9, 2022

17 THE CENTER FOR INVESTIGATIVE REPORTING

18 By: /s/ Shawn Musgrave  
19 D. VICTORIA BARANESTSKY  
20 SHAWN MUSGRAVE  
21 Attorneys for Plaintiffs

21 **ATTESTATION**

22 In compliance with Civil L.R. 5-1(h)(3), I attest that I have obtained concurrence in the filing of  
23 this document from each of the other signatories.

24  
25 Dated: May 9, 2022


25 By: /s/ Sapna Mehta  
26 SAPNA MEHTA  
27 Assistant United States Attorney  
28 Attorney for Defendant

1 **ORDER**

2 Pursuant to the stipulation of the parties, and good cause having been shown, it is hereby  
3 ordered that the telephonic case management conference currently set for May 17, 2022 is continued to  
4 June 28, 2022 at 2:00 p.m. The parties will file a joint status report by June 21, 2022.

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6 IT IS SO ORDERED.

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8 DATED: 5/10/2022

9   
10 THE HON. HAYWOOD S. GILLIAM, JR.  
11 United States District Judge  
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