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

12 THE CENTER FOR INVESTIGATIVE REPORTING, et al.,

13 Plaintiffs,

14 v.

15 U.S. DEPARTMENT OF HOMELAND SECURITY,

16 Defendant.

) Case No. 4:21-cv-09633-HSG

) **STIPULATED REQUEST TO VACATE**
) **SCHEDULING ORDER (DKT. 37) AND TO**
) **SCHEDULE CASE MANAGEMENT**
) **CONFERENCE; ORDER (as modified)**

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 stipulated request to vacate the
 22 deadlines set forth in the Court’s Scheduling Order (Dkt. 37), including the motions hearing set for
 23 March 30, 2023, and to schedule a case management conference for March 28, 2023. This stipulation is
 24 based on the following facts:

- 25 1. This action, filed on December 14, 2021, arises out of a Freedom of Information Act
 26 (“FOIA”) request submitted by Plaintiffs to Defendant. The parties have resolved all
 27 issues regarding the search for and release of responsive documents in response to the
 28

1 FOIA request. The parties thus stipulate and request that the deadlines for summary
2 judgment briefing set forth in the Court’s Scheduling Order (Dkt. 37), including the
3 motions hearing set for March 30, 2023, be vacated.

4 2. The only remaining issue in this matter is Plaintiffs’ request for attorney’s fees. Plaintiffs
5 intend to send Defendant their fee request by February 10, 2023 and the parties will then
6 confer to resolve any disputed issues relating to Plaintiffs’ fee request. The parties thus
7 respectfully request that the Court schedule a case management conference on March 28,
8 2023, or a subsequent date convenient to the Court, to give the parties time to confer.
9 The parties will file a joint status report by March 21, 2023 if this matter has not been
10 resolved by that time. If resolution is reached before then, the parties will file a
11 stipulation of dismissal.

12 Respectfully submitted,

13 STEPHANIE M. HINDS
14 United States Attorney

15 Dated: January 13, 2023

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

18 Dated: January 13, 2023

18 THE CENTER FOR INVESTIGATIVE REPORTING

19 By: /s/ Victoria Baranestsky
20 D. VICTORIA BARANETSKY
21 Attorney for Plaintiffs

22 **ATTESTATION**

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

26 Dated: January 13, 2023


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

ORDER

Pursuant to the stipulation of the parties, and good cause having been shown, it is hereby ordered that the deadlines set forth in the Court's Scheduling Order (Dkt. 37), including the motions hearing set for March 30, 2023, are VACATED. A telephonic case management conference is scheduled for March 28, 2023 at 2:00 p.m. and the parties shall file a joint status report by March 21, 2023.

IT IS SO ORDERED.

DATED: 1/17/2023


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