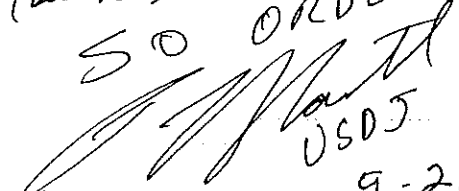


Arnold & Porter

R. Stanton Jones
 +1 202.942.5563 Direct
 Stanton.Jones@arnoldporter.com

The November 16, 2021
 hearing is VACATED.
 All deadlines are
 extended by
 45 days. Either motion
 (Doc 132) should be terminated.

November 4, 2021

SO ORDERED

 USDJ
 11-9-21

VIA ECF

The Honorable P. Kevin Castel

Re: *Ragbir, et al. v. Johnson, et al.*, 18-cv-1159 (PKC)

Dear Judge Castel:

Counsel for Plaintiffs and Defendants (“the Parties”) respectfully write to submit this joint request for the Court to adjourn all deadlines and hearings and to hold this action in abeyance. On September 22, 2021, the Court granted the Parties’ proposed briefing schedule, under which Defendants’ motion to dismiss is currently due on November 8, 2021. ECF No. 129. On October 6, 2021, this Court provisionally scheduled an evidentiary hearing for November 15, 2021, to address potential factual disputes related to the issue of mootness, ECF No. 131, and subsequently rescheduled that hearing to November 16, 2021. Yesterday, however, the Parties reached an agreement in principle to resolve the entire action without further litigation. In order to allow the Parties time to memorialize the agreed-upon settlement terms in a written stipulation and order of dismissal, the Parties jointly request that this Court adjourn *sine die* the evidentiary hearing and all briefing deadlines, and hold this action in abeyance for 45 days, until December 20, 2021.

Because the Parties have reached an agreement that would resolve the entire case, the Parties respectfully submit that it would be prudent to hold this action in abeyance, while adjourning the hearing and all deadlines, to permit the parties time to reduce that agreement to writing. The Parties submit that an abeyance will advance the interests of the Parties and the Court by facilitating the anticipated resolution of this case in lieu of further litigation, and avoid the unnecessary expenditure of additional judicial and party resources.

We thank the Court for its consideration of this request.

Arnold & Porter

The Honorable P. Kevin Castel

November 4, 2021

Page 2

Alina Das
Jessica Rofé
WASHINGTON SQUARE
LEGAL SERVICES, INC.
Immigrant Rights Clinic
New York University School of Law
245 Sullivan Street, 5th Floor
New York, New York 10012
(347) 693-6485
alina.das@nyu.edu

Respectfully Submitted,

/s/ R. Stanton Jones

R. Stanton Jones
William C. Perdue
ARNOLD & PORTER
KAYE SCHOLER LLP
601 Massachusetts Ave. NW
Washington, DC 20001
(202) 942-5000
(202) 942-5999 (fax)
stanton.jones@arnoldporter.com

Attorneys for Plaintiffs

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

/s/ Brandon M. Waterman

BRANDON M. WATERMAN
Assistant United States Attorney
86 Chambers Street, Third Floor
New York, New York 10007
Tel. (212) 637-2741

Attorney for Defendants