

The Honorable James L. Robart
United States District Judge

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

A.A., Antonio MACHIC YAC, and W.H.,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES; UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY; James MCCAMENT, Acting
Director, U.S. Citizenship and Immigration
Services; Elaine DUKE, Acting Secretary,
U.S. Department of Homeland Security,

Defendants.

Case No. 2:15-cv-00813-JLR

STIPULATION AND ~~PROPOSED~~ ORDER
REQUESTING EXTENSION OF TIME TO
FILE COMBINED JOINT STATUS REPORT
AND DISCOVERY PLAN and EXCHANGE
INITIAL DISCLOSURES

NOTE ON MOTION CALENDAR:
August 29, 2017

Pursuant to this Court's Order of August 3, 2017, ECF No. 98, the parties must exchange initial disclosures by August 31, 2017, and file a Combined Joint Status Report and Discovery Plan by September 7, 2017. As ordered, the parties held a Rule 26(f) conference on August 11, 2017. However, due to ongoing settlement discussions, other negotiations between the parties regarding discovery, and previously scheduled leave and travel obligations, the parties request an approximately three-week extension to exchange their initial disclosures and file the Combined Joint Status Report and Discovery Plan.

Accordingly, the parties to the above-referenced action, by and through their undersigned counsel of record, hereby respectfully STIPULATE, AGREE, and JOINTLY REQUEST that the

Stipulation and ~~Proposed~~ Order
Case No. 2:15-cv-00813-JLR

U.S. Department of Justice, Civil Division
Office of Immigration Litigation
P.O. Box 868, Ben Franklin Station
Washington, D.C. 20044
(202) 598-2446

1 Court extend the deadlines for initial disclosures and the Combined Joint Status Report and
2 Discovery Plan by approximately three weeks. The parties request that initial disclosures be due
3 on or before September 20, 2017, and that the Combined Joint Status Report and Discovery Plan
4 be due on or before September 28, 2017.

5
6 DATED: August 29, 2017

Respectfully submitted,

7 CHAD A. READLER
8 Acting Assistant Attorney General

s/ Melissa Crow
MELISSA CROW
American Immigration Council
1331 G Street, N.W., Suite 200
Washington, D.C. 20005
Phone: (202) 507-7523
Email: mcrow@immcouncil.org

9 WILLIAM C. PEACHEY
10 Director

11 JEFFREY S. ROBINS
Assistant Director

DEVIN THERIOT-ORR
Sunbird Law, PLLC
1001 4th Avenue, Suite 3200
Seattle, WA 98154
Phone: (206) 962-5052

12 *s/Adrienne Zack*
13 ADRIENNE ZACK
14 Trial Attorney
15 U.S. Department of Justice
Civil Division
16 Office of Immigration Litigation
District Court Section
17 P.O. Box 868, Ben Franklin Station
Washington, D.C. 20044
18 Phone: (202) 598-2443
19 Fax: (202) 305-7000
Email: adrienne.m.zack@usdoj.gov

CHRISTOPHER STRAWN
Northwest Immigrant Rights Project
615 2nd Avenue, Suite 400
Seattle, WA 98104
Phone: (206) 957-8628
Fax: (206) 587-4025
Email: chris@nwirp.org

20 Attorneys for Defendants

MARC VAN DER HOUT
Van Der Hout, Brigagliano, and Nightingale,
LLP
180 Sutter Street, Suite 500
San Francisco, CA 94104
Phone: (415) 981-3000
Email: ndca@vblaw.com

21
22
23
24
25 Attorneys for Plaintiffs
26
27
28

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 29, 2017, I electronically filed the foregoing Stipulation Requesting Extension of Time to File Combined Joint Status Report and Discovery Plan and Exchange Initial Disclosures with the Clerk of the Court using CM/ECF. I also certify that the foregoing document should automatically be served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

s/ Adrienne Zack
ADRIENNE ZACK
Trial Attorney
U.S. Department of Justice

The Honorable James L. Robart
United States District Judge

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

A.A., et al.,

Plaintiffs,

v.

UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES, et al.,

Defendants.

Case No. 2:15-cv-00813-JLR

~~PROPOSED~~ ORDER EXTENDING TIME
TO FILE COMBINED JOINT STATUS
REPORT AND DISCOVERY PLAN and
EXCHANGE INITIAL DISCLOSURES

NOTE ON MOTION CALENDAR:
August 29, 2017

~~Proposed~~ ORDER

The parties having so stipulated and agreed, it is hereby SO ORDERED.

The parties shall exchange initial disclosures on or before September 20, 2017, and the
Combined Joint Status Report and Discovery Plan shall be due on or before September 28, 2017.

The Clerk is directed to send copies of this Order to all counsel of record.

Dated this 30 day of August, 2017.

The Honorable James L. Robart
United States District Judge

1 Presented by:

2 CHAD A. READLER

3 Acting Assistant Attorney General

4 WILLIAM C. PEACHEY

5 Director

6 JEFFREY S. ROBINS

7 Assistant Director

8 *s/ Adrienne Zack*

9 ADRIENNE ZACK

10 Trial Attorney

11 U.S. Department of Justice

12 Civil Division

13 Office of Immigration Litigation

14 District Court Section

15 P.O. Box 868, Ben Franklin Station

16 Washington, D.C. 20044

17 Phone: (202) 598-2446

18 Fax: (202) 305-7000

19 Email: adrienne.m.zack@usdoj.gov

20 Attorneys for Defendants

21

22

23

24

25

26

27

28