

The Honorable Marsha J. Pechman

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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

AMERICAN CIVIL LIBERTIES UNION OF
WASHINGTON; AMERICAN CIVIL
LIBERTIES UNION OF MONTANA; and
AMERICAN CIVIL LIBERTIES UNION OF
NORTH DAKOTA,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY and U.S. CUSTOMS AND
BORDER PROTECTION,

Defendants.

Case No.: 2:17-cv-00562-MJP

**STIPULATION FOR ORDER
EXTENDING PRODUCTION
DEADLINE; ORDER THEREON**

WHEREAS, in this action, Defendants are required to complete their review and processing of records identified as potentially responsive to Plaintiffs' request under the Freedom of Information Act ("FOIA") and produce any responsive, non-exempt records identified in that review by January 16, 2018; and

WHEREAS Defendants anticipate that they will be able to complete that review, processing, and production of non-exempt, responsive records by that date, save for approximately 150 records, for which Defendants anticipate they will be able to complete review, processing, and production to Plaintiffs by January 19, 2018; and

Stipulation for Order Extending Prod Deadline - 1
Case No. 2:17-cv-00562-MJP

United States Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Ave. NW Washington D.C. 20001
(202) 514-3367

1 WHEREAS Defendants have requested an additional three days—through January 19,
2 2018—in which to complete review, processing, and production of those approximately 150
3 records; and

4 WHEREAS Plaintiffs have no objection to a three-day extension of the production
5 deadline for the completion of review, processing, and production of those approximately 150
6 records;

7 NOW THEREFORE, the parties, through their respective counsel, do hereby stipulate
8 and agree that that the Court may make and enter the following order:

9 Defendants shall complete their review and processing of the remaining, approximately
10 150 outstanding records identified as potentially responsive to Plaintiffs' FOIA request, and
11 produce to Plaintiffs all non-exempt, responsive records, by January 19, 2018.

12 SO STIPULATED.

13 Dated: January 10, 2018

Respectfully submitted,

14 Davis Wright Tremaine LLP

United States Department of Justice

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By /s/
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ELIZABETH J. SHAPIRO
Deputy Director, Federal Programs Branch

Attorneys for Defendants
U.S. Department of Homeland Security and U.S.
Customs and Border Protection

ORDER

IT IS SO ORDERED.

DATED: This 12th day of January 2018.


MARSHA J. PECHMAN
United States District Judge

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CERTIFICATE OF SERVICE

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2 I hereby certify that on the 10th day of January, 2018, I electronically filed the
3 foregoing with the Clerk of Court by using the CM/ECF system. I certify that the following
4 parties or their counsel of record are registered as ECF filers and that they will be served by the
5 CM/ECF system:

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14 *Attorneys for Plaintiffs American Civil Liberties Union of Washington, American Civil
15 Liberties Union of Montana, and American Civil Liberties Union of North Dakota*

16 /s/ Jason Lee
17 Jason Lee