

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  
CONTINUING DEADLINE TO  
SUBMIT JOINT STATUS  
REPORT; ORDER THEREON**

WHEREAS Defendants have produced non-exempt records responsive to Plaintiffs' request under the Freedom of Information Act ("FOIA") pursuant to the terms of the Court's Orders dated October 20, 2017 (ECF No. 36) and January 12, 2018 (ECF No. 40); and

WHEREAS the parties are required to submit a joint status report and proposed case schedule to the Court by January 31, 2018; and

WHEREAS the parties require additional time in which to meet and confer regarding Defendants' response to Plaintiffs' FOIA request and a proposed case schedule;

Stipulation for Order Continuing JSR 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 NOW THEREFORE, the parties, through their respective counsel, do hereby stipulate  
2 and agree that that the Court may make and enter the following order:

3 The deadline for the parties' forthcoming joint status report and proposed case schedule,  
4 currently due by January 31, 2018, is hereby continued for thirty days and shall be filed by  
5 March 2, 2018. That filing should provide (without limitation):

- 6 1. The status of Defendants' response to Plaintiffs' FOIA request, and  
7 2. A proposed briefing schedule for dispositive motions, if appropriate.

8 SO STIPULATED.

9 Dated: January 29, 2018

Respectfully submitted,

10 Davis Wright Tremaine LLP

United States Department of Justice

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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 <sup>80<sup>th</sup></sup><sub>29<sup>th</sup></sub> day of January 2018.



MARSHA J. PECHMAN  
United States District Judge

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**CERTIFICATE OF SERVICE**

1 I hereby certify that on the 29th day of January, 2018, I electronically filed the  
2  
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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20 *Liberties Union of Montana, and American Civil Liberties Union of North Dakota*

21 /s/ Jason Lee  
22 Jason Lee