

The Honorable James L. Robart

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

Maria Mora-Villalpando,  
Plaintiff,

No. C18-655-JLR

JOINT STATUS REPORT

v.

U.S. Immigration and Customs Enforcement,  
U.S. Customs and Border Protection, and U.S.  
Citizenship and Immigration Services,  
Defendants.

The parties hereby file this Joint Status Report as required by the Court's Order on Cross Motions for Summary Judgment (Dkt. #52). The Court ordered the parties to provide a joint status report within two months concerning their progress with the Court's rulings.

U.S. Immigration and Customs Enforcement ("ICE") has conducted initial searches of the Office of Principal Legal Advisor ("OPLA") Case Management System ("OCMS PLANet"). Defendants provided initial results of their searches for these search terms to the Plaintiff and the parties are in the process discussing these results and determining if the search terms may be

1 narrowed. The parties request that they be granted more time to confer on these points and  
2 propose updating the court on the progress in 60 days.

3 For plaintiff's third FOIA request,<sup>1</sup> U.S. Customs and Immigration Services ("USCIS")  
4 will conduct a search of the EDMS database once search terms are agreed upon. Plaintiff has  
5 proposed the following:

6 "Copies of any I-213s, with identifying information redacted, where any of the following  
7 is noted:

8 1. An individual's public statement or statements to the media regarding their  
9 immigration status or lack thereof;

10 2. An individual's involvement with an immigrant rights organization or  
11 organizations;

12 3. An individual's involvement with "anti-ICE protest", "protests", "immigration  
13 advocacy", "immigrant rights", "activism", "organizing", and/or "advocacy"; and/or

14 4. An individual's status as an "advocate", "activist", "media", and/or a "journalist."

15 USCIS is currently evaluating plaintiff's proposed search terms and the search  
16 capabilities of the EDMS system. Once search terms are agreed upon, USCIS will conduct the  
17 search and ICE will review documents prior to production.

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20 <sup>1</sup> Plaintiff's third FOIA request is, "Copies of any I-213s, with identifying information redacted, where ICE has  
initiated enforcement action against an individual due to:

- 21 1. the individual's public statement or statements to the media regarding  
their immigration status;  
22 2. the individual's involvement in 'anti-ICE protests,' and/or 'immigrant  
rights' activism; and/or  
23 3. the individual's involvement in 'Latino advocacy programs,'  
'immigration advocacy,' 'activism,' and/or 'organizing.'"

1 In addition, the parties have agreed that all searches will involve the time frame of  
2 January 20, 2017 to the present.

3 To keep the Court apprised, the parties will provide the Court with another Joint Status  
4 Report within 60 days of this Joint Status Report, unless the Court orders otherwise.

5 Dated this 26<sup>th</sup> day of September, 2019.

6  
7 /s/ Khaled Alrabe

Khaled Alrabe, NY Bar Reg. 5542311 (admitted  
8 *pro hac vice*)

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**ORDER**

The parties will submit another joint status report within 60 days of the date of this order.

Dated this 26<sup>th</sup> day of September, 2019.



James L. Robart  
United States District Judge