

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

YOLANY PADILLA.; IBIS GUZMAN.; BLANCA
ORANTES; BALTAZAR VASQUEZ;

Plaintiffs-Petitioners,

v.

U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT
("ICE"); U.S. DEPARTMENT OF HOMELAND
SECURITY ("DHS"); U.S. CUSTOMS AND BORDER
PROTECTION ("CBP"); U.S. CITIZENSHIP AND
IMMIGRATION SERVICES ("USCIS"); EXECUTIVE
OFFICE FOR IMMIGRATION REVIEW ("EOIR");
MATTHEW ALBENCE, Acting Director of ICE; KEVIN K.
MCALEENAN, Acting Secretary of DHS; JOHN P.
SANDERS, Acting Commissioner of CBP; L. FRANCIS
CISSNA, Director of USCIS; ELIZABETH GODFREY,
Seattle Field Office Acting Director, ICE; WILLIAM BARR,
United States Attorney General; LOWELL CLARK, warden
of the Northwest Detention Center in Tacoma, Washington;
CHARLES INGRAM, warden of the Federal Detention
Center in SeaTac, Washington; DAVID SHINN, warden of
the Federal Correctional Institute in Victorville, California;
JAMES JANECKA, warden of the Adelanto Detention
Facility;

Defendants-Respondents.

No. 2:18-cv-928 MJP

**JOINT STIPULATION
AND ~~PROPOSED~~
ORDER REGARDING
PRELIMINARY
INJUNCTION
IMPLEMENTATION**

NOTE ON MOTION
CALENDAR: JUNE 25, 2019.

Pursuant to Local Civil Rules 7(d)(1) and 10(g), Plaintiffs and Defendants hereby stipulate and jointly move the Court for an Order staying implementation of the preliminary injunction, entered by this Court on April 5, 2019, by an additional week, until July 8, 2019.¹

Currently, the hearing on the motions is set for Friday, June 28, 2019, and the injunction implementation date is Monday, July 1, 2019 (the next business day). The parties respectfully

¹ By rule, the parties cannot further extend the deadline for filing an appeal, and the operative deadline to appeal the injunction is July 5, 2019. *See* ECF 129.

1 move for this stay in light of the upcoming hearing on Defendants' motion to vacate the injunction
2 and Plaintiffs' motion to modify the injunction, in order to provide certainty as to the
3 implementation date and avoid unnecessary confusion that would result from implementing an
4 injunction that would soon be vacated or modified. Should this Court rule on the motion to vacate
5 and motion to modify prior to July 8, the parties would be bound by that order and any vacatur or
6 timeline for implementing a modified injunction, and not this stipulation.

1 RESPECTFULLY SUBMITTED this 25th day of June, 2019.

2
3 s/ Matt Adams

4 Matt Adams, WSBA No. 28287

5 Email: matt@nwirp.org

6 Leila Kang, WSBA No. 48048

7 Email: leila@nwirp.org

8 Aaron Korthuis, WSBA No. 53974

9 Email: aaron@nwirp.org

10 NORTHWEST IMMIGRANT
11 RIGHTS PROJECT

12 615 Second Avenue, Suite 400
13 Seattle, WA 98104

14 Telephone: (206) 957-8611

15 Facsimile: (206) 587-4025

16 *Attorneys for Plaintiffs-Petitioners*

Kristin Macleod-Ball*

Trina Realmuto*

AMERICAN IMMIGRATION COUNCIL

1318 Beacon Street, Suite 18

Brookline, MA 02446

(857) 305-3600

trealmuto@immcouncil.org

kmacleod-ball@immcouncil.org

Judy Rabinovitz*

Michael Tan*

Anand Balakrishnan*

ACLU IMMIGRANTS' RIGHTS PROJECT

125 Broad Street, 18th floor

New York, NY 10004

(212) 549-2618

*Admitted *pro hac vice*

Attorneys for Plaintiffs-Petitioners

17 JOSEPH. H. HUNT

18 Assistant Attorney General

19 Civil Division

20 WILLIAM C. PEACHEY

21 Director, District Court Section

22 Office of Immigration Litigation

23 EREZ REUVENI

24 Assistant Director, District Court Section

25 Office of Immigration Litigation

26 SARAH S. WILSON

Assistant United States Attorney

/s/ Lauren C. Bingham

LAUREN C. BINGHAM, Fl. Bar #105745

Trial Attorney, District Court Section

Office of Immigration Litigation

Civil Division

P.O. Box 868, Ben Franklin Station

Washington, DC 20044

(202) 616-4458; (202) 305-7000 (fax)

lauren.c.bingham@usdoj.gov

ARCHITH RAMKUMAR

Trial Attorney

Attorneys for Defendants-Respondents

JOINT STIPULATION AND ORDER
REGARDING PRELIMINARY INJUNCTION
IMPLEMENTATION - 3

CASE NO. 2:18-cv-928 MJP

ORDER

Based on the foregoing stipulation of the parties, IT IS SO ORDERED. Compliance with the preliminary injunction is STAYED until July 8, 2019.

DATED this 28th day of June, 2019.



Marsha J. Pechman
United States Senior District Judge

CERTIFICATE OF SERVICE

I hereby certify that on June 28, 2019, I had the foregoing electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to those attorneys of record registered on the CM/ECF system. All other parties (if any) shall be served in accordance with the Federal Rules of Civil Procedure.

/s/ Lauren C. Bingham

LAUREN C. BINGHAM, Fl. Bar #105745

Trial Attorney, District Court Section

Office of Immigration Litigation

Civil Division

P.O. Box 868, Ben Franklin Station

Washington, DC 20044

(202) 616-4458; (202) 305-7000 (fax)

lauren.c.bingham@usdoj.gov

Attorney for Defendants