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## The Honorable Marsha J. Pechman

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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

YOLANY PADILLA, on behalf of herself and her 6-year-old son J.A.; IBIS GUZMAN, on behalf of herself and her 5-year-old son R.G.; BLANCA ORANTES, on behalf of herself and her 8-year-old son A.M.; BALTAZAR VASQUEZ, on behalf of himself:

Plaintiffs-Petitioners,

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U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT DEPARTMENT ("ICE"); U.S. OF **HOMELAND** SECURITY ("DHS"); U.S. CUSTOMS AND BORDER PROTECTION ("CBP"); U.S. CITIZENSHIP AND IMMIGRATION SERVICES ("USCIS"); EXECUTIVE OFFICE FOR IMMIGRATION REVIEW ("EOIR"); THOMAS HOMAN, Acting Director of ICE; KIRSTJEN NIELSEN, Secretary of DHS; KEVIN K. McALEENAN, Acting Commissioner of CBP; L. FRANCIS CISSNA, Director of USCIS; MARC J. MOORE, Seattle Field Office **JEFFERSON** Director. ICE. **BEAUREGARD** SESSIONS III, 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 ECONOMICS
ORDER REGARDING
MOTION FOR
PRELIMINARY
INJUNCTION BRIEFING
SCHEDULE

NOTE ON MOTION CALENDAR: OCTOBER 1, 2018.

Pursuant to Local Civil Rules 7(d)(1) and 10(g), Plaintiffs and Defendants hereby stipulate and jointly move the Court for an Order revising the schedule for the filing of Defendants' response in opposition to Plaintiffs' motion for preliminary injunction, and Plaintiffs' reply in support of their motion.

Currently Defendants' response to Plaintiffs' motion for preliminary injunction is due October 8, 2018, which is the Columbus Day holiday, and Plaintiffs' reply is October 12, 2018.

JOINT STIPULATION AND ORDER REGARDING MOTION FOR PRELIMINARY INJUNCTION BRIEFING SCHEDULE - 1
CASE No. 2:18-cv-928 MJP

U.S. Department of Justice, Civil Division Office of Immigration Litigation, District Court Section PO Box 868, Ben Franklin Station Washington, DC 20044 Telephone (202) 616-4458

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PRELIMINARY INJUNCTION BRIEFING

SCHEDULE - 2

CASE No. 2:18-cv-928 MJP

After consultation between the parties' counsel, the parties stipulate to an extension until October 17, 2018, for Defendants to file their response to Plaintiffs' motion, and an extension until October 26, 2018, for Plaintiffs' to file their reply in support of their motion. Plaintiffs will re-note their motion for October 26, 2018. The reason for this stipulation is to allow both sides sufficient time to brief these important issues thoroughly for the Court. This requested extension will not impact any other deadlines in the case. RESPECTFULLY SUBMITTED this 1st day of October, 2018. s/ Matt Adams Kristin Macleod-Ball\* Matt Adams, WSBA No. 28287 Trina Realmuto\* Email: matt@nwirp.org AMERICAN IMMIGRATION COUNCIL Glenda M. Aldana Madrid, WSBA No. 46987 100 Summer Street, 23rd Floor Email: glenda@nwirp.org Boston, MA 02110 (857) 305-3600 Leila Kang, WSBA No. 48048 trealmuto@immcouncil.org Email: leila@nwirp.org kmacleod-ball@immcouncil.org NORTHWEST IMMIGRANT \*Admitted pro hac vice **RIGHTS PROJECT** 615 Second Avenue, Suite 400 Attorneys for Plaintiffs-Petitioners Seattle, WA 98104 Telephone: (206) 957-8611 Facsimile: (206) 587-4025 Attorneys for Plaintiffs-Petitioners JOSEPH. H. HUNT /s/ Lauren C. Bingham LAUREN C. BINGHAM, Fl. Bar #105745 Assistant Attorney General Civil Division Trial Attorney, District Court Section Office of Immigration Litigation WILLIAM C. PEACHEY Civil Division Director, District Court Section P.O. Box 868, Ben Franklin Station Office of Immigration Litigation Washington, DC 20044 (202) 616-4458; (202) 305-7000 (fax) **EREZ REUVENI** lauren.c.bingham@usdoj.gov Assistant Director, District Court Section Office of Immigration Litigation Attorneys for Defendants-Respondents JOINT STIPULATION AND U.S. Department of Justice, Civil Division ORDER REGARDING MOTION FOR Office of Immigration Litigation, District Court Section

PO Box 868, Ben Franklin Station

Washington, DC 20044 Telephone (202) 616-4458

## [PROPOSED] ORDER

Based on the foregoing stipulation of the parties, IT IS SO ORDERED. Defendants' response to Plaintiffs' motion for preliminary injunction will be due October 17, 2018. Plaintiffs' reply to their motion for preliminary injunction will be due October 26, 2018, and their motion will be noted for that date.

DATED this 3 day of Och , 2018

THE HONORABLE MARSHA J. PECHMAN UNITED STATES DISTRICT JUDGE

JOINT STIPULATION AND ORDER REGARDING MOTION FOR PRELIMINARY INJUNCTION BRIEFING SCHEDULE - 3

CASE No. 2:18-cv-928 MJP

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### **CERTIFICATE OF SERVICE**

I hereby certify that on October 1, 2018, 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
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Washington, DC 20044
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Attorney for Defendants

JOINT STIPULATION AND [PROPOSED] ORDER REGARDING MOTION FOR PRELIMINARY INJUNCTION BRIEFING SCHEDULE - 4
CASE No. 2:18-cv-928 MJP

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