Padilla et al v. I	JS Immigrations or 2: Costor (Control Control	10/15/18 Page 1 of 5
	Case 2:18-cv-00928-MJP Document 79 Filed	10/11/18 Page 1 of 5
1	The	e Honorable Marsha J. Pechman
2		
3		
4		
5		
6		
7	UNITED STATES DISTRICT CO	
8	WESTERN DISTRICT OF WASHI AT SEATTLE	NGTON
9	YOLANY PADILLA, on behalf of herself and her	
10	6-year-old son J.A.; IBIS GUZMAN, on behalf of herself	No. 2:18-cv-928 MJP
11	and her 5-year-old son R.G.; BLANCA ORANTES, on behalf of herself and her 8-year-old son A.M.; BALTAZAR	
12	VASQUEZ, on behalf of himself; Plaintiffs-Petitioners,	JOINT STIPULATION
13	V.	ORDER REGARDING
14	U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT	EXCHANGE OF INITIAL DISCLOSURES AND
15	("ICE"); U.S. DEPARTMENT OF HOMELAND	SUBMISSION OF 26(f)
	SECURITY ("DHS"); U.S. CUSTOMS AND BORDER PROTECTION ("CBP"); U.S. CITIZENSHIP AND	REPORT
16	IMMIGRATION SERVICES ("USCIS"); EXECUTIVE	
17	OFFICE FOR IMMIGRATION REVIEW ("EOIR"); THOMAS HOMAN, Acting Director of ICE; KIRSTJEN	Note On Motion Calendar: October
18	NIELSEN, Secretary of DHS; KEVIN K. MCALEENAN, Acting Commissioner of CBP; L. FRANCIS CISSNA,	11, 2018.
19	Director of USCIS; MARC J. MOORE, Seattle Field Office	
20	Director, ICE, JEFFERSON BEAUREGARD SESSIONS III, United States Attorney General; LOWELL	
21	CLARK, warden of the Northwest Detention Center in Tacoma, Washington; CHARLES INGRAM, warden of the	
22	Federal Detention Center in SeaTac, Washington; DAVID	
23	SHINN, warden of the Federal Correctional Institute in Victorville, California; JAMES JANECKA, warden of the	
24	Adelanto Detention Facility;	
25	Defendants-Respondents.	
26		
	JOINT STIPULATION AND	Northwest Immigrant Rights Project 615 Second Ave., Ste. 400
	REGARDING EXCHANGE OF	Seattle, WA 98104
	INITIAL DISCLOSURES AND SUBMISSION OF 26(f)	Telephone (206) 957-8611
	REPORT- 1	
	I CARENIA 2.10 ar 020 MID	

Dockets.Justia.com

Case 2:18-cv-00928-MJP Document 81 Filed 10/15/18 Page 2 of 5 Case 2:18-cv-00928-MJP Document 79 Filed 10/11/18 Page 2 of 5

Pursuant to Local Civil Rules 7(d)(1) and 10(g), Plaintiffs and Defendants hereby stipulate and jointly move the Court for an Order extending the deadline for the exchange of initial disclosures and the filing of the Fed. R. Civ. P. 26(f) report.

On July 31, 2018, this Court entered an order setting the deadlines or the parties to meet and confer pursuant to Fed. R. Civ. P. 26(f), and to exchange initial disclosures and file a 26(f) report. ECF 17. The parties jointly determined that it was prudent to brief the issues in the motion to dismiss and motion for class certification prior to having a Rule 26(f) conference so that both parties had a fuller understanding of the issues. Pursuant to the instructions in that order, the parties jointly telephoned the Courtroom Deputy to request an extension. A thirty-day extension was granted. ECF 32.

The parties have met and conferred pursuant to this Court's order. However, after the conference, the parties agreed that additional time to discuss would be productive, and would lead to the submission of a 26(f) report that would be more useful to the Court. Accordingly, the parties jointly request an additional 30-day extension of the deadline to exchange initial disclosures and submit a Rule 26(f) report to the Court.

16

17

19

20

21

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

RESPECTFULLY SUBMITTED this 11th day of October, 2018.

s/ Matt Adams Matt Adams, WSBA No. 28287

Email: matt@nwirp.org 18

- Glenda M. Aldana Madrid, WSBA No. 46987 Email: glenda@nwirp.org
- Leila Kang, WSBA No. 48048 Email: leila@nwirp.org

22 NORTHWEST IMMIGRANT 23 **RIGHTS PROJECT** 615 Second Avenue, Suite 400 24 Seattle, WA 98104 Telephone: (206) 957-8611 25 Facsimile: (206) 587-4025 26

Attorneys for Plaintiffs-Petitioners

Kristin Macleod-Ball* Trina Realmuto*

AMERICAN IMMIGRATION COUNCIL 100 Summer Street, 23rd Floor Boston, MA 02110 (857) 305-3600 trealmuto@immcouncil.org kmacleod-ball@immcouncil.org

*Admitted pro hac vice

Attorneys for Plaintiffs-Petitioners

JOINT STIPULATION AND ORDER **REGARDING EXCHANGE OF** INITIAL DISCLOSURES AND SUBMISSION OF 26(f) REPORT- 2 CARE NO 2.10 at 010 MID

Northwest Immigrant Rights Project 615 Second Ave., Ste. 400 Seattle, WA 98104 Telephone (206) 957-8611

	Case 2:18-cv-00928-MJP Document 81 Filed 10/15/18 Page 3 of 5 Case 2:18-cv-00928-MJP Document 79 Filed 10/11/18 Page 3 of 5
1 2 3 4 5 6 7 8	JOSEPH. H. HUNT Assistant Attorney General Civil Division/s/ Lauren C. Bingham LAUREN C. BINGHAM, Fl. Bar #105745 Trial Attorney, District Court Section Office of Immigration LitigationWILLIAM C. PEACHEY Director, District Court Section Office of Immigration LitigationCivil Division P.O. Box 868, Ben Franklin Station Washington, DC 20044 (202) 616-4458; (202) 305-7000 (fax) lauren.c.bingham@usdoj.gov Attorneys for Defendants-Respondents
9 10	
10	
12	
12	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
	JOINT STIPULATION ANDNorthwest Immigrant Rights Project 615 Second Ave., Ste. 400REGARDING EXCHANGE OF615 Second Ave., Ste. 400INITIAL DISCLOSURES ANDSeattle, WA 98104SUBMISSION OF 26(f)Telephone (206) 957-8611REPORT- 3CASE No. 2:18 cm 028, MID

1	Case 2:18-cv-00928-MJP Document 81 Filed 10/15/18 Page 4 of 5 Case 2:18-cv-00928-MJP Document 79 Filed 10/11/18 Page 4 of 5
1	ORDER
2	Based on the foregoing stipulation of the parties, IT IS SO ORDERED. The parties shall
3	exchange initial disclosures by November 5, 2018. The parties shall submit their 26(f) report by
4	November 12, 2018.
5	
6 7	DATED this 15 day of $0ch$, 2018.
8	$\gamma \sim \rho$
9	Mayolulu
10	THE HONORABLE MARSHA J. PECHMAN
11	UNITED STATES DASTRICT JUDGE
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
	JOINT STIPULATION ANDNorthwest Immigrant Rights ProjectImportant ORDER615 Second Ave., Ste. 400REGARDING EXCHANGE OFSeattle, WA 98104INITIAL DISCLOSURES ANDTelephone (206) 957-8611SUBMISSION OF 26(f)PEDORT 4

REPORT- 4

CERTIFICATE OF SERVICE

2	I hereby certify that on October 11, 2018, I had the foregoing electronically filed with the	
3	Clerk of the Court using the CM/ECF system, which will send notification of such filing to those	
4	attorneys of record registered on the CM/ECF system. All other parties (if any) shall be served	
5	in accordance with the Federal Rules of Civil Procedure.	
6 7		
8	/s/ Lauren C. Bingham	
9	LAUREN C. BINGHAM, Fl. Bar #105745 Trial Attorney, District Court Section	
10	Office of Immigration Litigation Civil Division	
11	P.O. Box 868, Ben Franklin Station Washington, DC 20044	
12	(202) 616-4458; (202) 305-7000 (fax)	
13	lauren.c.bingham@usdoj.gov	
14	Attorney for Defendants	
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25 26		
20		
	JOINT STIPULATION ANDNorthwest Immigrant Rights ProjectImage: Strain of the strain of	

1