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15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA

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18 COMMUNITY JUSTICE EXCHANGE,
JUST FUTURES LAW, MIJENTE
19 SUPPORT COMMITTEE,

20 Plaintiffs

21 v.

22 U.S. IMMIGRATION & CUSTOMS
ENFORCEMENT and U.S. DEPARTMENT
23 OF HOMELAND SECURITY

24 Defendants.
25

No. 22-cv-2328-LB

**STIPULATION AND JOINT REQUEST FOR
ORDER EXTENDING INITIAL CASE
MANAGEMENT CONFERENCE;
DECLARATION OF KENNETH
BRAKEBILL; [PROPOSED] ORDER**

Honorable Laurel Beeler

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27 STIPULATION AND JOINT REQUEST FOR ORDER EXTENDING INITIAL CASE MANAGEMENT CONFERENCE;
DECLARATION OF KENNETH BRAKEBILL; [PROPOSED] ORDER
28 22-CV-2328-LB

1 Plaintiffs (Community Justice Exchange, Just Futures Law, Mijente Support Committee) and
2 Defendants (U.S. Immigration & Customs Enforcement and U.S. Department of Homeland Security) by
3 and through their counsel, hereby stipulate, pursuant to Civil Local Rules 6-1, 6-2, and 7-12, as follows:

4 WHEREAS, Plaintiffs filed a Complaint on April 14, 2022 (ECF No. 1);

5 WHEREAS, on April 15, 2022 the Court issued an Initial Case Management Scheduling Order
6 setting an initial case management conference on July 14, 2022 (ECF No. 4);

7 WHEREAS, Defendants filed an Answer on May 23, 2022 (ECF No. 10);

8 WHEREAS, on June, 14, 202 the Clerk issued a Notice Resetting Case Management Conference
9 for July 28, 2022 (ECF No. 12);

10 WHEREAS, after the June 14, 2022 Notice, counsel for the parties met and conferred regarding
11 a continuance of the initial case management conference due to scheduling conflicts,

12 NOW THEREFORE, the parties hereby STIPULATE as follows:

13 The parties STIPULATE and JOINTLY REQUEST that the Court continue the initial case
14 management conference set for July 28, 2022 at 9:30 a.m. to August 25, 2022 a.m.

15 DATED: June 30, 2022

Respectfully submitted,

16 STEPHANIE M. HINDS
17 United States Attorney

18 /s/ Kenneth W. Brakebill
KENNETH W. BRAKEBILL*
19 Assistant United States Attorney

20 Attorneys for Defendant

21 DATED: June 30, 2022

22 /s/ Catherine Crump

23 Catherine Crump
24 Attorney for Plaintiffs

25 **In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty of perjury
26 that counsel for Plaintiff has concurred in the filing of this document.*

27 STIPULATION AND JOINT REQUEST FOR ORDER EXTENDING INITIAL CASE MANAGEMENT CONFERENCE;
28 DECLARATION OF KENNETH BRAKEBILL; [PROPOSED] ORDER
22-CV-2328-LB

DECLARATION OF KENNETH BRAKEBILL

I, Kenneth Brakebill, declare and state as follows:

1. I am an Assistant United States Attorney in the Northern District of California and counsel of record for Defendants in the above-captioned action.

2. I submit this declaration in support of the Stipulation and Joint Request to extend the initial case management conference.

3. Counsel for both parties were available for the initial case management conference previously scheduled on July 14, 2022.

4. The Clerk's notice resetting the initial case management conference to July 28, 2022, which also reset the deadline for the filing of the parties' joint initial case management conference to July 21, 2022, presented scheduling conflicts for counsel for both parties. Counsel for Plaintiffs is out of the country during the two weeks prior to the currently-scheduled case management conference, while counsel for Defendants is out of the office on the date of the conference.

4. The parties therefore propose to move the date of the initial case management conference from July 28, 2022 to August 25, 2022. The proposed date is the next date that both counsel are available for the Court's Thursday case management conference schedule.

5. There has been no other schedule change, or request to move dates, in this case.

6. While this date change pushes the initial case management conference back by four weeks, it will not delay progress in this case. The parties have been diligently working toward an agreement concerning search and production. The parties hope to be able to report on such an agreement by the time of the initial case management conference.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: June 30, 2022

/s/ Kenneth Brakebill

KENNETH BRAKEBILL
Assistant United States Attorney

[PROPOSED] ORDER

PURSUANT TO STIPULATION, and good cause appearing, IT IS SO ORDERED that the parties' initial case management conference set for July 28, 2022 at 9:30 a.m. shall be continued to August 25, 2022 a.m.. The parties shall submit their joint case management conference statement by August 18, 2022.

Dated: _____

LAUREL BEELER
UNITED STATES MAGISTRATE JUDGE