

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ABDIQAFAR WAGAFE, *et al.*, on behalf
of themselves and others similarly situated,

Plaintiffs,

v.

JOSEPH R. BIDEN, President of the
United States, *et al.*,

Defendants.

No. 2:17-cv-00094-RAJ

**JOINT STIPULATION FOR ORDER
ALLOWING REDACTED FILINGS OF
SUMMARY JUDGMENT BRIEFING
DESIGNATED AS HIGHLY SENSITIVE
DOCUMENTS PENDING RESOLUTION
OF THE MOTIONS TO SEAL**

WHEREAS the Court’s General Order No. 03-21 (“General Order”) states that highly sensitive documents (“HSD”) cannot be filed on the public docket; and

WHEREAS guidance from the Court Clerk also indicates that documents or filings that discuss or contain information from HSDs also cannot be filed on the public docket; and

WHEREAS Defendants state that Plaintiffs’ Motion for Summary Judgment, Defendants’ Opposition to Plaintiffs’ Motion for Summary Judgment and Cross Motion for Summary Judgment, Plaintiffs’ Reply and Opposition to Defendants’ Cross Motion, Defendants’ Reply, and the Third Declaration of Jennifer Pasquarella¹ (collectively the “Filings”) contain information from and discuss the content of documents produced in this case that Defendants have designated as HSD; and

WHEREAS as a result, none of the Filings appear on the public docket, in any form; and

¹ Docket numbers are unavailable for the Filings because the Filings were not filed on the public docket.
JOINT STIPULATION FOR ORDER ALLOWING REDACTED
FILINGS OF DOCUMENTS DESIGNATED UNDER GENERAL
ORDER NO. 03-21.

1 WHEREAS Plaintiffs dispute Defendants' designation of certain produced documents as
2 HSD, *see* Dkts. 464, 483, 502, 513, 533, 536, 543, 560, 562, and 566; and

3 WHEREAS the parties believe that, notwithstanding their disagreement, the proposed
4 stipulated order will enable the parties to comply with LCR 7(g)(5)(A), which requires a publicly
5 filed redacted version of any brief filed under seal,

6 NOW THEREFORE the parties do hereby stipulate and agree that the Court may make
7 and enter the following order:

8 1. The parties shall file mutually agreed upon redacted versions of the Filings on the
9 public docket pending resolution of the Motions to Seal. These redacted versions shall be filed
10 on the public docket regardless of whether the Filings contain or discuss information contained
11 in HSDs.

12 2. The redacted filed versions shall keep hidden from public access any information
13 Defendants assert to be HSD and/or subject to a protective order issued in this case. *See* Dkts.
14 86, 183, 192, 274.

15 3. The parties shall file the redacted Filings within three weeks from the date this
16 stipulation is entered by the Court, unless otherwise ordered by the Court.

17 4. Nothing in this stipulation resolves or shall be construed as resolving the pending
18 motions regarding Defendants' HSD designations and to seal the summary judgment briefs and
19 supporting papers. *See* Dkts. 464, 483, 502, 513, 533, 536, 543, 560, 562, and 566 (HSD); and
20 Dkts. 465, 481, 510, 514, 534, 538, 544, 561, 564, and 567 (Sealing).

1 **SO STIPULATED.**

DATED: July 15, 2021

2 s/ Jennifer Pasquarella
3 s/ Liga Chia
4 Jennifer Pasquarella (admitted pro hac vice)
5 Liga Chia (admitted pro hac vice)
6 **ACLU Foundation of Southern California**
7 1313 W. 8th Street
8 Los Angeles, CA 90017
9 Telephone: (213) 977-5236
10 jpasquarella@aclusocal.org
11 lchia@aclusocal.org

s/ Harry H. Schneider, Jr.
s/ Nicholas P. Gellert
s/ David A. Perez
s/ Heath L. Hyatt
s/ Paige L. Whidbee
Harry H. Schneider, Jr. #9404
Nicholas P. Gellert #18041
David A. Perez #43959
Heath L. Hyatt #54141
Paige L. Whidbee #55072
Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: (206) 359-8000
HSchneider@perkinscoie.com
Ngellert@perkinscoie.com
Dperez@perkinscoie.com
Hhyatt@perkinscoie.com
Pwhidbee@perkinscoie.com

8 s/ Matt Adams
9 Matt Adams #28287
10 **Northwest Immigrant Rights Project**
11 615 Second Avenue, Suite 400
12 Seattle, WA 98122
13 Telephone: (206) 957-8611
14 matt@nwirp.org

s/ John Midgley
John Midgley #6511
ACLU of Washington
P.O. Box 2728
Seattle, WA 98111
Telephone: (206) 624-2184
jmidgley@aclu-wa.org

11 s/ Stacy Tolchin
12 Stacy Tolchin (admitted pro hac vice)
13 **Law Offices of Stacy Tolchin**
14 634 S. Spring Street, Suite 500A
15 Los Angeles, CA 90014
16 Telephone: (213) 622-7450
17 Stacy@tolchinimmigration.com

s/ Sameer Ahmed
s/ Sabrineh Ardalan
Sameer Ahmed (admitted pro hac vice)
Sabrineh Ardalan (admitted pro hac vice)
**Harvard Immigration and Refugee
Clinical Program**
Harvard Law School
6 Everett Street, Suite 3105
Cambridge, MA 02138
Telephone: (617) 495-0638
sahmed@law.harvard.edu
sardalan@law.harvard.edu

16 s/ Hugh Handeyside
17 s/ Lee Gelernt
18 s/ Hina Shamsi
19 s/ Charles Hogle
20 Hugh Handeyside #39792
21 Lee Gelernt (admitted pro hac vice)
22 Hina Shamsi (admitted pro hac vice)
23 Charles Hogle (admitted pro hac vice)
24 **American Civil Liberties Union Foundation**
25 125 Broad Street
26 New York, NY 10004
27 Telephone: (212) 549-2616
28 hhandeyside@aclu.org
lgelernt@aclu.org
hshamsi@aclu.org
chogle@aclu.org

Counsel for Plaintiffs

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SO STIPULATED.

DATED: July 15, 2021

BRIAN M. BOYNTON
Acting Assistant Attorney General
Civil Division
U.S. Department of Justice

JESSE L. BUSEN
Counsel for National Security
National Security Unit
Office of Immigration Litigation

AUGUST FLENTJE
Special Counsel
Civil Division
Office of Immigration Litigation

W. MANNING EVANS
Senior Litigation Counsel
Office of Immigration Litigation

ETHAN B. KANTER
Chief, National Security Unit
Office of Immigration Litigation

BRENDAN T. MOORE
Trial Attorney
Office of Immigration Litigation

TESSA M. GORMAN
Acting United States Attorney

LEON B. TARANTO
Trial Attorney
Torts Branch
Civil Division

BRIAN C. KIPNIS
Assistant United States Attorney
Western District of Washington

VICTORIA M. BRAGA
Trial Attorney
Office of Immigration Litigation

LINDSAY M. MURPHY
Senior Counsel for National Security
National Security Unit
Office of Immigration Litigation

Counsel for Defendants

ANNE DONOHUE
Counsel for National Security
National Security Unit
Office of Immigration Litigation

ORDER

IT IS SO ORDERED.

DATED: _____, 2021.

RICHARD A. JONES
United States District Judge

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