

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

CLEAR; AMERICAN CIVIL LIBERTIES
UNION; and AMERICAN CIVIL
LIBERTIES UNION FOUNDATION,

Plaintiffs,

v.

UNITED STATES CUSTOMS AND
BORDER PROTECTION,

Defendant.

No. 1:19-cv-07079-RER

CONSENT MOTION TO RESCHEDULE STATUS ONFERENCE

Plaintiffs respectfully move the Court to reschedule the status conference currently set for February 7, 2023, at 10:00 a.m. On January 18, 2023, the Court ordered Plaintiffs to respond within thirty days—by February 17, 2023—to a letter to the Court filed by Defendant on January 17, 2023. Defendant’s letter addresses Defendant’s supplemental declarations and the production of 720 pages of re-processed records, also shared with Plaintiffs on January 17, 2023. Plaintiffs are currently reviewing those supplemental declarations and re-processed records and intend to identify any remaining issues with those declarations and records in their letter to the court on February 17, 2023. Plaintiffs therefore respectfully request that the Court reschedule the status conference for a date following February 17, 2023, as the Court’s schedule permits. Plaintiffs’ counsel have conferred with Defendant’s counsel and Defendant consents to the motion.

Respectfully submitted,

/s/ Scarlet Kim

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