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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO-OAKLAND DIVISION

AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION, *et al.*,

*Plaintiffs,*

v.

DEPARTMENT OF JUSTICE, *et al.*,

*Defendants.*

Case No. 19-CV-00290-EMC

**CONSENT MOTION FOR EXTENSION  
OF TIME AND ADDITIONAL PAGES**

Courtroom: 5  
Judge: Hon. Edward M. Chen

**Extension of Time**

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2 Pursuant to Local Rules 6-3 and 7-11, Plaintiffs respectfully request a two-week  
3 extension of time to file their Cross-Motion and Opposition to Defendants' Motion for Partial  
4 Summary Judgment, extending the due date from March 11 to March 25, 2021. To accommodate  
5 this change, Plaintiffs respectfully request a corresponding extension of Defendants' time to file  
6 their Reply and Opposition, and Plaintiff's Reply, from April 9, 2021 and April 23, 2021 to April  
7 23, 2021 and May 6, 2021, respectively. Plaintiffs further request that the motion hearing date,  
8 currently set for May 6, 2021, be continued to May 20, 2021 or a date thereafter to be determined  
9 by the Court. Defendants consent to this request.

10 The parties originally stipulated, and the Court ordered, that Defendants be granted an  
11 extension of time from November 4 to December 10, 2020 to file their Motion for Partial  
12 Summary Judgment as to Defendants CBP, ICE, and USCIS. (ECF 82). Defendants subsequently  
13 moved, with consent or no objection from Plaintiffs, for additional extensions of time to file their  
14 motion. (ECF 89, 90, 92, 93, 95, 96). Defendants filed their Motion for Partial Summary  
15 Judgment on January 28, 2021. (ECF 98).

16 Since then, Plaintiffs have worked diligently to review Defendants' declarations and  
17 Vaughn indices, and to reassess the redactions and withholdings in Defendants' document  
18 productions. Nonetheless, due to the large volume of documents and numerous legal issues that  
19 Defendants' motion raises, Plaintiffs require additional time to prepare their Cross-Motion and  
20 Opposition. Plaintiffs are currently reviewing thousands of pages of redactions and withholdings  
21 against Defendants' final Vaughn indices and are working to further narrow the set of issues  
22 requiring the Court's attention. Plaintiffs therefore maintain that good cause exists to extend the  
23 deadline for Plaintiffs' Cross-Motion and Opposition and to revise the briefing schedule  
24 accordingly.

**Page Limit Increase**

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27 Pursuant to Local Rule 7-11, Plaintiffs further request a 10-page expansion of the page  
28 limit for their Cross-Motion and Opposition to Defendants' Motion for Summary Judgment,

1 from 25 pages to 35 pages. Plaintiffs believe that the standard applicable page limit does not  
2 permit adequate analysis of the large volume of information and the numerous legal issues these  
3 cross-motions raise. Plaintiffs therefore submit that an expansion of the limit by 10 pages will  
4 benefit the Court and enable focused and efficient treatment of those issues without prejudicing  
5 either party.

6 Defendants consent to this request. If the Court grants Plaintiffs' request, the parties  
7 jointly request that the page limit for Defendants' Opposition and Reply brief be expanded by 10  
8 pages as well.

9  
10  
11 Respectfully submitted,

12 DATED: March 1, 2021

/s/ Matthew Cagle  
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