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10	Attorneys for Plaintiffs		
11	• •	S DISTRICT COURT	
12	NORTHERN DISTRICT OF CALIFORNIA		
12	SAN FRANCISCO-	OAKLAND DIVISION	
13		I	
14	AMERICAN CIVIL LIBERTIES UNION		
15	FOUNDATION, et al.,	Case No. 19-CV-00290-EMC	
16	Plaintiffs,	CONSENT MOTION TO EXTEND DEADLINE FOR JOINT CASE	
17	V.	MANAGEMENT STATEMENT AND CONTINUE CASE MANAGEMENT	
18	DEPARTMENT OF JUSTICE, et al.,	CONFERENCE	
		Courtroom: 5	
19	Defendants.	Judge: Hon. Edward M. Chen	
20			
21			
22	Pursuant to Local Rule 6-3, Plaintiffs move with Defendants' consent for a one-week		
23	extension of the deadline to submit a joint case management statement, currently set for May 6,		
24	2021, and a one-week continuance of the case management conference set for May 13, 2021. See		
25	ECF No. 101.		
26	On May 5, 2021, counsel for Defendants informed Plaintiffs' counsel that, due to a		
27	medical emergency requiring hospitalization, counsel is unable to assemble the information		
28	necessary to finalize the joint case management statement for submission by the May 6 deadline.		

Case 3:19-cv-00290-EMC Document 118 Filed 05/05/21 Page 2 of 2

1	Plaintiffs therefore respectfully request that the Court reset the deadline to submit a joint case	
2	management statement to Thursday, May 13, 2021 and continue the case management	
3	conference until Thursday, May 20, 2021 or a date to be determined by the Court.	
4		
5	Respectfully submitted,	
6	DATED: May 5, 2021 /s/ Matthew Cagle	
7	Matthew Cagle American Civil Liberties Union Foundation of	
8	Northern California 39 Drumm Street	
9	San Francisco, CA 94111	
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15	Attorneys for Plaintiffs	
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6	UNITED STATES DISTRICT COURT	
7	NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO-OAKLAND DIVISION	
8	SAN TRANCISCO-OARLAND DIVISION	
9	AMERICAN CIVIL LIBERTIES	
10	UNION FOUNDATION, et al.,	Case No. 19-CV-00290-EMC
11	Plaintiffs,	
12	V.	
13	DEPARTMENT OF JUSTICE, et al.,	
14		
15	Defendants.	
16		
17	[PROPOSED] ORDER	
18	Upon the motion for extension of time filed by Plaintiffs with Defendants'	
19	consent, and good cause appearing, the	Court hereby orders the extension of the
20 21	deadline to submit a joint case managem	nent statement and to hold a case
22	management conference, as follows:	
23	May 13, 2021 – Joint case management statement due	
24	May 20, 2021 – Case management conference	
25	IT IS SO ORDERED.	
26		
27	Dated:, 2021	
28	Hon. Edward M. Chen United States District Judge	

[PROPOSED] ORDER CASE NO. 19-CV-00290-EMC