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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 TO EXTEND  
DEADLINE FOR JOINT CASE  
MANAGEMENT STATEMENT AND  
CONTINUE CASE MANAGEMENT  
CONFERENCE**

Courtroom: 5  
Judge: Hon. Edward M. Chen

Pursuant to Local Rule 6-3, Plaintiffs move with Defendants' consent for a one-week extension of the deadline to submit a joint case management statement, currently set for May 6, 2021, and a one-week continuance of the case management conference set for May 13, 2021. *See* ECF No. 101.

On May 5, 2021, counsel for Defendants informed Plaintiffs' counsel that, due to a medical emergency requiring hospitalization, counsel is unable to assemble the information necessary to finalize the joint case management statement for submission by the May 6 deadline.

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  
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UNITED STATES DISTRICT COURT  
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Case No. 19-CV-00290-EMC

**[PROPOSED] ORDER**

Upon the motion for extension of time filed by Plaintiffs with Defendants’ consent, and good cause appearing, the Court hereby orders the extension of the deadline to submit a joint case management statement and to hold a case management conference, as follows:

May 13, 2021 – Joint case management statement due

May 20, 2021 – Case management conference

IT IS SO ORDERED.

Dated: \_\_\_\_\_, 2021

\_\_\_\_\_  
Hon. Edward M. Chen  
United States District Judge