

Steven M. Wilker, OSB No. 911882

Email: steven.wilker@tonkon.com

Tonkon Torp LLP

1600 Pioneer Tower

888 SW 5th Avenue

Portland, OR 97204

Tel: 503.802.2040; Fax: 503.972.3740

Cooperating Attorney for the ACLU Foundation of Oregon

Ben Wizner (Admitted *pro hac vice*)

Email: bwizner@aclu.org

Nusrat Jahan Choudhury (Admitted *pro hac vice*)

Email: nchoudhury@aclu.org

American Civil Liberties Union Foundation

125 Broad Street, 18th Floor

New York, NY 10004

Tel: 212.519.2500; Fax: 212.549.2654

Kevin Díaz, OSB No. 970480

Email: kdiaz@aclu-or.org

ACLU Foundation of Oregon

P.O. Box 40585

Portland, Oregon 97240

Tel: 503.227.6928; Fax: 503.227.6948

Attorneys for Plaintiffs

Tony West

Assistant Attorney General

Civil Division

Sandra M. Schraibman

Assistant Branch Director

Federal Programs Branch

Diane Kelleher

Email: diane.kelleher@usdoj.gov

Amy Powell

Email: Amy.powell@usdoj.gov

U.S. Department of Justice

Civil Division, Federal Programs Branch

20 Massachusetts Avenue, N.W., #7318

Washington, D.C. 20001

Phone: (202) 514-4775

Fax: (202) 616-8470

Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

AYMAN LATIF, *et al.*,

Plaintiffs,

v.

ERIC H. HOLDER, JR., *et al.*,

Defendants.

No. 10-cv-750 (BR)

PARTIES' JOINT STATUS
REPORT

The parties, Plaintiffs Ayman Latif, Raymond Earl Knaeble IV, Faisal Nabin Kashem, Elias Mustafa Mohamed, Steven William Washburn, Samir Mohamed Ahmed Mohamed, Abdullatif Muthanna, Nagib Ali Ghaleb, Mohamed Sheikh Abdirahman Kariye, Ibraheim Y. Mashal, Salah Ali Ahmed, Amir Meshal, Stephen Durga Persaud, Saleh Omar, Abdul Hakeim Thabet Ahmed, Adama Bah, and Halime Sat, and Defendants Eric H. Holder Jr., Attorney General of the United States; Robert Mueller, Director of the Federal Bureau of Investigation; and Timothy Healy, Director of the Terrorist Screening Center, hereby submit this joint status report pursuant to the Court's order of October 8, 2010.

Pursuant to the Court's October 27, 2010 order, the Defendants' dispositive motion is due on November 17, 2010; Plaintiffs' response and cross-motion is due on December 17, 2010; the Defendants' reply to its dispositive motion and response to Plaintiffs' cross-motion is due on January 11, 2011; and Plaintiffs' reply is due on January 25, at 2011. The parties expect that, prior to the filing of dispositive motions, they will agree upon some of the material facts related to the Traveler Redress Inquiry Program (TRIP), which is the process established by the

government for resolving complaints related to denial of boarding. At the Court's suggestion, the parties have exchanged drafts of stipulated facts and have conferred by telephone regarding the drafts.

Dated: November 4, 2010

Respectfully Submitted,

TONY WEST
Assistant Attorney General

SANDRA SCHRAIBMAN
Assistant Branch Director
Federal Programs Branch

/s/ Ben Wizner

s/ Diane Kelleher

Ben Wizner (Admitted *pro hac vice*)
Email: bwizner@aclu.org
Nusrat Jahan Choudhury (Admitted *pro hac vice*)
Email: nchoudhury@aclu.org
American Civil Liberties Union Foundation
125 Broad Street, 18th Floor
New York, NY 10004
Tel: 212.519.2500
Fax: 212.549.2654

Attorneys for Plaintiffs

Diane Kelleher
Email: diane.kelleher@usdoj.gov
Amy Powell
Email: amy.powell@usdoj.gov
Attorneys
U.S. Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Avenue, N.W.
Washington, D.C. 20001
Tel: (202) 514-4775
Fax: (202) 616-8470

Attorneys for Defendants