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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
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13 LEILA N. SADAT, *et al.*,
14
15 Plaintiffs,
16
17 v.
18
19 JOSEPH R. BIDEN, *et al.*,
20
21 Defendants.
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Case No. 3: 21-cv-00416-CRB
NOTICE

NOTICE

1
2 Defendants President Joseph R. Biden, *et al.*, (“Defendants”) respectfully notify the Court
3 about recent developments in the above-captioned case. On January 15, 2021, Plaintiffs Leila N.
4 Sadat, *et al.*, (“Plaintiffs”) initiated the instant lawsuit challenging Executive Order 13928
5 (“Blocking Property of Certain Persons Associated With the International Criminal Court”)
6 pursuant to the First Amendment of the U.S. Constitution and the Administrative Procedure Act.
7 *See* Compl., ECF No. 1. Plaintiffs subsequently filed a motion for a preliminary injunction, ECF
8 No. 42; the Court adopted the parties’ proposed briefing schedule, which requires Defendants to
9 file a response to Plaintiffs’ motion for a preliminary injunction by Friday, April 9, 2021. *See*
10 Order, ECF No. 44.

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12 On April 1, 2021, President Biden terminated the national emergency declared in Executive
13 Order 13928 and revoked the Order. *See* Exec. Order, *available at*
14 [https://www.whitehouse.gov/briefing-room/presidential-actions/2021/04/01/executive-order-on-](https://www.whitehouse.gov/briefing-room/presidential-actions/2021/04/01/executive-order-on-the-termination-of-emergency-with-respect-to-the-international-criminal-court/)
15 [the-termination-of-emergency-with-respect-to-the-international-criminal-court/](https://www.whitehouse.gov/briefing-room/presidential-actions/2021/04/01/executive-order-on-the-termination-of-emergency-with-respect-to-the-international-criminal-court/); *see also* Press
16 Statement, *available at* [https://www.state.gov/ending-sanctions-and-visa-restrictions-against-](https://www.state.gov/ending-sanctions-and-visa-restrictions-against-personnel-of-the-international-criminal-court/)
17 [personnel-of-the-international-criminal-court/](https://www.state.gov/ending-sanctions-and-visa-restrictions-against-personnel-of-the-international-criminal-court/). And on April 5, 2021, the Office of Foreign Assets
18 Control within the Department of the Treasury removed Ms. Fatou Bensouda and Mr. Phakiso
19 Mochochoko from the list of Specially Designated Nationals and Blocked Persons—persons
20 blocked pursuant to Executive Order 13928. *See* Recent Activity, *available at*
21 https://home.treasury.gov/policy-issues/financial-sanctions/recent-actions/20210405_33.

22
23 Accordingly, undersigned counsel contacted Plaintiffs’ counsel to schedule a time to confer
24 about these recent developments. In particular, Defendants would like to discuss whether Plaintiffs
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1 share their view that these recent events have obviated the need for the Court to issue a preliminary
2 injunction. Further, Defendants would like to discuss whether the developments have also
3 obviated the need for additional litigation altogether. Defendants will keep the Court updated
4 about the parties' dialogue.

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6 Dated: April 6, 2021

Respectfully Submitted,

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