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

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

11 *Plaintiffs,*

12 v.

13 DEPARTMENT OF JUSTICE, *et al.*,

14 *Defendants.*
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Case No. 19-CV-00290-EMC

JOINT STATUS REPORT

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18 The parties jointly submit this status report pursuant to the Court’s order
19 issued during the telephone status conference held on April 16, 2020 (ECF No.
20 52). The Court has requested that the parties submit a proposed timeline for partial
21 summary judgment briefing with respect to withholdings by three Department of
22 Homeland Security (“DHS”) components—U.S. Customs and Border Protection,
23 U.S. Immigration and Customs Enforcement, and U.S. Citizenship and
24 Immigration Services—that have completed their productions in response to
25 Plaintiffs’ FOIA request.

26 Since the April 16, 2020, status conference, the parties have met and
27 conferred to discuss ways to reduce the number of issues for adjudication by the
28 Court. The parties are currently attempting to reach agreement on a plan for the

1 three DHS components at issue to provide Plaintiffs with additional information
2 regarding the categories of information withheld by Defendants to allow the parties
3 to try to come to agreement on a list of disputed withholdings. The parties will try
4 to reach agreement on such a plan as soon as possible so that they can identify a
5 feasible date to commence summary judgment briefing and propose a schedule for
6 the parties' anticipated cross-motions. The parties hope to be able to conclude
7 these negotiations over the next week, and will report back to the Court at the
8 status conference to be held on June 18, 2020.

9 Respectfully submitted,

10 DATED: June 11, 2020

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