1 2 3 4 5 UNITED STATES DISTRICT COURT 6 NORTHERN DISTRICT OF CALIFORNIA 7 SAN FRANCISCO-OAKLAND DIVISION 8 9 AMERICAN CIVIL LIBERTIES Case No. 19-CV-00290-EMC 10 UNION FOUNDATION, et al., 11 Plaintiffs, JOINT STATUS REPORT 12 v. 13 DEPARTMENT OF JUSTICE, et al., 14 Defendants. 15 16 17 Pursuant to the Court's June 18, 2020 order (ECF No. 59), the parties 18 respectfully propose the following briefing schedule for cross-motions for 19 summary judgment regarding Plaintiffs' FOIA requests to U.S. Citizenship and 20 Immigration Services, U.S. Immigration and Customs Enforcement, and U.S. 21 **Customs and Border Protection:** 22 Defendants' opening brief shall be filed no later than November 9, 1. 23 2020. 24 2. Plaintiffs' cross-motion and opposition shall be filed no later than 25 December 4, 2020. 26 3. Defendants' reply and opposition shall be filed no later than January 27 6, 2021. 28

4. Plaintiffs' reply shall be filed no later than January 20, 2021. 1 The parties further request a hearing on the cross-motions for summary 2 judgment at a time to be determined by the Court. 3 4 Respectfully submitted, 5 6 /s/ **DATED:** August 31, 2020 Hugh Handeyside 7 American Civil Liberties Union Foundation 8 125 Broad Street, 18th Floor New York, NY 10004 9 Telephone: 212-549-2500 10 hhandeyside@aclu.org 11 Matthew Cagle 12 American Civil Liberties Union Foundation of Northern California 13 39 Drumm Street 14 San Francisco, CA 94111 Telephone: 415-621-2493 15 mcagle@aclunc.org 16 Attorneys for Plaintiffs 17 18 19 ETHAN P. DAVIS Acting Assistant Attorney General 20 ELIZABETH J. SHAPIRO (D.C. Bar No. 418925) 21 Deputy Branch Director 22 **ELIZABETH TUL**IS (NY Bar) 23 Trial Attorney
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ATTESTATION Pursuant to Local Rule 5-1(i)(3), I attest that I am the ECF user whose user ID and password are being used in the electronic filing of this document, and further attest that I have obtained the concurrence in the filing of the document from the other signatory. <u>/s Elizabeth Tulis</u> ELIZABETH TULIS JOINT STATUS REPORT