Case 3:19-cv-00290-EMC Docume	ent 72 Filed 09/02/20 Page 1 of 3					
UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA						
SAN FRANCISCO-OAKLAND DIVISION						
AMERICAN CIVIL LIBERTIES UNION FOUNDATION, <i>et al.</i> ,	Case No. 19-CV-00290-EMC					
Plaintiffs, v.	JOINT STATUS REPORT					
DEPARTMENT OF JUSTICE, et al.,						

Pursuant to the Court's June 18, 2020 order (ECF No. 59), the parties respectfully propose the following briefing schedule for cross-motions for summary judgment regarding Plaintiffs' FOIA requests to U.S. Citizenship and Immigration Services, U.S. Immigration and Customs Enforcement, and U.S. Customs and Border Protection:

Defendants.

Defendants' opening brief shall be filed no later than November 9,
2020.

2. Plaintiffs' cross-motion and opposition shall be filed no later than December 4, 2020.

Defendants' reply and opposition shall be filed no later than January
6, 2021.

4. Plaintiffs' reply shall be filed no later than January 20, 2021. The parties further request a hearing on the cross-motions for summary judgment at a time to be determined by the Court.

1

2

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 ÉLIZABETH TULIS (NY Bar) 23 Trial Attorney U.S. Department of Justice, Civil Division, Federal Programs Branch 1100 L Street, NW Washington, D.C. 20005 Telephone: (202) 514-9237 elizabeth.tulis@usdoj.gov 24 25 26 27 Attorneys for Defendants 28 2 JOINT STATUS REPORT CASE NO. 19-CV-00290-EMC

THE FOLLOWING BRIEFING SCHEDULE IS ADOPTED:

 For the parties' forthcoming cross-motions for summary judgment regarding Plaintiffs' FOIA requests to U.S. Citizenship and Immigration Services, U.S. Immigration and Customs Enforcement, and U.S. Customs and Border Protection:

a.	Defendants' opening brief shall be filed no later than November 9,
	2020.
1.	

 b. Plaintiffs' cross-motion and opposition shall be filed no later than December 4, 2020.

- c. Defendants' reply and opposition shall be filed no later than January 6, 2021.
- d. Plaintiffs' reply shall be filed no later than January 20, 2021.
- e. The hearing on these motions shall be held on <u>February 4, 2021 at</u> 1:30PM

Hon. Edward M. Chen United States District Judge

September 2	2,	2020	
Date			