

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Civ. No. 17-CV-02835 (DWF/DTS)

Abdisalam Wilwal, *et al.*,

Plaintiffs,

v.

Kirstjen Nielsen, *et al.*,

Defendants.

Case No. 0:17-cv-02835

JOINT STIPULATION TO STAY DISCOVERY

The parties, by counsel, state as follows:

WHEREAS, the parties have begun settlement discussions in earnest in this matter and wish to focus their energies on potentially reaching a mutually agreeable resolution; and

WHEREAS, on March 12, 2019, this Court held an initial pretrial conference, during which time the parties agreed to stay discovery in this matter until a settlement conference could be held on the issue of monetary relief; and

WHEREAS, the Court indicated during the settlement conference that it was inclined stay discovery until a settlement conference could be held; and

WHEREAS, on March 18, 2019, this Court ordered that a settlement conference be held on May 23, 2019; and

WHEREAS, such a stay would allow the parties time to discuss potential equitable relief as a component of settlement in this matter, in advance of the conference;

THEREFORE, the parties stipulate and respectfully propose that the Court stay all discovery in this matter through May 23, 2019, the date of the settlement conference. The parties further

stipulate and propose that the parties provide an update to the Court at the settlement conference as to the status of the parties' discussions, and the need, if any, to amend any deadlines in this matter.

Dated: March 25, 2019

Respectfully submitted,

<p><u>/s/Hugh Handeyside</u> Hugh Handeyside (<i>pro hac vice</i>) Hina Shamsi (<i>pro hac vice</i>) American Civil Liberties Union Foundation 125 Broad Street, 18th Floor New York, NY 10004 (212) 549-2500 (phone) (212) 549-2583 (facsimile) hhandeyside@aclu.org hshamsi@aclu.org</p> <p>Teresa Nelson (No. 269736) John Gordon (No. 363237) Ian Bratlie (No. 319454) American Civil Liberties Union Foundation of Minnesota 2300 Myrtle Avenue, Suite 180 Saint Paul, MN 55114 (651) 645-4097 (phone) (651) 647-5948 (facsimile) tnelson@aclu-mn.org jgordon@aclu-mn.org ibratlie@aclu-mn.org</p> <p>Randall Tietjen (No. 214474) Amira A. ElShareif (No. 0395348) Sarah E. Friedrichs (No. 0397466) Robins Kaplan LLP 800 LaSalle Avenue Suite 2800 Minneapolis, MN 55402 (612) 349-8500 RTietjen@RobinsKaplan.com AEIShareif@RobinsKaplan.com SFriedricks@RobinsKaplan.com</p> <p>Counsel for Plaintiffs</p>	<p>ERICA A. MACDONALD United States Attorney</p> <p>ERIN M. SECORD Asst. United States Attorney Attorney ID Number 0391789 600 U.S. Courthouse 300 South Fourth Street Minneapolis, MN 55415 (612) 664-5600 Erin.Secord@usdoj.gov</p> <p>JOSEPH H. HUNT Assistant Attorney General, Civil Division</p> <p>JOHN R. TYLER Assistant Branch Director</p> <p><u>/s/ Michael Drezner</u> MICHAEL DREZNER Trial Attorney U.S. Department of Justice Civil Division, Federal Programs Branch VA Bar No. 83836 Tel: (202) 514-4505 Michael.L.Drezner@usdoj.gov Attorneys for Defendants</p> <p>JAMES G. TOUHEY, JR. Director, Torts Branch</p> <p>ROGER EINERSON Deputy Director, Torts Branch</p>
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/s/ Paul David Stern

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