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1 2 3 4 5 6 7 8 9 10	JOSEPH H. HUNT Assistant Attorney General SCOTT G. STEWART Deputy Assistant Attorney General WILLIAM C. PEACHEY Director EREZ REUVENI Assistant Director Office of Immigration Litigation U.S. Department of Justice, Civil Divis P.O. Box 868, Ben Franklin Station Washington, DC 20044 Tel: (202) 307-4293 Email: Erez.R.Reuveni@usdoj.gov PATRICK GLEN Senior Litigation Counsel				
11 12	UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA				
<ol> <li>13</li> <li>14</li> <li>15</li> <li>16</li> </ol>	East Bay Sanctuary Covenant, <i>et al.</i> , Plaintiffs,	,	EMERGENCY MC TME	TION TO SHORTEN	
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> </ol>	v. William Barr, <i>et al.</i> , Defendants.	) ) ( ) ) )	Civil Action No. 1:	19-cv-04073-JST	
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	DEFENDANTS' MOTION FOR STAY East Bay Sanctuary v. Barr, Case No. 1:19-cv-04073-JST				

1 Defendants have filed an emergency motion to stay the Court's order issuing a preliminary 2 injunction (ECF No. 42) issued July 24, 2019. See ECF No. 47. As stated in that motion, if, upon 3 reviewing the motion for stay the Court does not believe that Defendants have met the 4 requirements for a stay. Defendants request that the Court summarily deny the motion without 5 awaiting a response from Plaintiffs. However, should the court request further briefing, Defendants now respectfully move this Court to shorten the time for briefing of that motion for stay. 6 Defendants request that the Court issue a decision on the motion no later than August 2, 2019. If 7 the Court does not grant Defendants' motion by noon Pacific time on that day, Defendants intend 8 9 to file with the United States Court of Appeals for the Ninth Circuit a motion seeking a stay of the 10 order entering a preliminary injunction.

Defendants have conferred with Plaintiffs, who indicate that they oppose the motion for stay and this motion to shorten time.

12	stay and this motion to shorten time.	
13		Respectfully submitted,
14		JOSEPH H. HUNT Assistant Attorney General
15		Assistant Attorney General
16		SCOTT G. STEWART Deputy Assistant Attorney General
17		
18		WILLIAM C. PEACHEY Director
19		By: <u>/s/ Erez Reuveni</u>
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26		PATRICK GLEN Senior Litigation Counsel
		Senior Entgation Counser
27	Dated: July 29, 2019	Attorneys for Defendants
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DEFENDANTS' MOTION FOR STAY East Bay Sanctuary v. Trump, Case No. 1:19-cv-04073-JST

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## **CERTIFICATE OF SERVICE**

I hereby certify that on July 29, 2019, I electronically filed the foregoing document with the Clerk of the Court for the United States Court of for the Northern District of California by using the CM/ECF system. Counsel in the case are registered CM/ECF users and service will be accomplished by the CM/ECF system.

By: <u>/s/ Erez Reuveni</u> EREZ REUVENI Assistant Director United States Department of Justice Civil Division