IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

RANJITHA SUBRAMANYA, individually

and on behalf of a class of those similarly

situated, et al.,

Case No. 2:20-CV-3707

•

Chief Judge Algenon L. Marbley

Plaintiffs,

:

Magistrate Judge Deavers

VS.

.

UNITED STATES CITIZENSHIP AND IMMIGRATION SERVICES, et al.,

JOINT STATUS REPORT REGARDING

PARTIES' PROPOSED CONSENT

ORDER, PURSUANT TO NOTATION

Defendants.

ORDER (ECF NO. 51)

On August 5, 2020, counsel for Plaintiffs and Defendants filed a request to continue the preliminary injunction hearing scheduled for August 10, 2020 until August 24, 2020 so that the parties will have time to negotiate a consent order to resolve the claims at issue in Plaintiffs' complaint. ECF No. 45. On August 6, 2020, this Court granted the Parties' motion to continue. ECF No. 46.

On August 10, 2020 counsel for Plaintiffs and Defendants filed a "Joint Motion for Magistrate Judge Mediated Negotiations for Consent Order," "so that the parties will have time to negotiate a consent decree to resolve the claims at issue in Plaintiffs' complaint." ECF No. 47.

On or about August 11, 2020 a settlement conference began before Chief Magistrate Judge Elizabeth A. Preston Deavers, by phone, pursuant to "Notice of Hearing." ECF No. 48; *see also* ECF No. 49, "Minute Entry for proceedings held before Magistrate Judge Elizabeth Preston Deavers: Settlement Conference held on 8/12/2020. Negotiations not at impasse. Parties continue to confer."; ECF No. 50, "Minute Entry for proceedings held before Magistrate Judge Elizabeth Preston Deavers: Continued mediation held on 8/13/2020. Parties continuing to mediate."

On August 17, 2020, this Court issued the following "Notation Order":

Joint Status Report regarding status, but not substance of settlement negotiations due by 8/18/2020. By Magistrate Judge Elizabeth Preston Deavers on 8/13/2020. ECF No. 51.

Counsel for Plaintiffs and Defendants report that they have come to agreement in principle upon material terms comprising a full resolution of Plaintiffs' claims. The Parties respectfully request of this Court the opportunity to finalize a "proposed consent order," for this Court's consideration, review, and order, not later than 5:00p.m., Thursday, August 20, 2020.

This extension of the opportunity to negotiate full resolution will not alter or delay the timeline and associated deadlines adopted by this Court pursuant to Order, but, rather, is intended to serve the interest of all parties, conserve the resources of this Court, and advance judicial economy by obviating the need for the Preliminary Injunction Hearing and/or hearing on the merits, and order upon same. ECF No. 46.

Respectfully submitted,

DAVID M. DEVILLERS United States Attorney

s/Christopher R. Yates

CHRISTOPHER R. YATES (0064776) Assistant United States Attorney 303 Marconi Boulevard, Suite 200 Columbus, Ohio 43215

E-mail: christopher.yates@usdoj.gov

Attorney for Defendants

s/Caroline H. Gentry

CAROLINE H. GENTRY (0066136) Porter Wright Morris & Arthur LLP One South Main Street, Suite 1600 Dayton, Ohio 45402

E-mail: cgentry@porterwright.com

and

Robert H. Cohen (0009216) David P. Shouvlin (0066154) Kirsten R. Fraser (0093951) Porter Wright Morris & Arthur LLP 41 South High Street, Suites 2800-3200 Columbus, Ohio 43215

E-mail: rcohen@porterwright.com
E-mail: dshouvlin@porterwright.com

E-mail: kfraser@porterwright.com

and

Ana P. Crawford (0090581) Porter Wright Morris & Arthur LLP 250 East Fifth Street, Suite 2200 Cincinnati, Ohio 45202

Email: acrawford@porterwright.com

Attorneys for Plaintiffs