



September 5, 2025

via CM/ECF

THE HONORABLE ANN AIKEN  
UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
405 EAST EIGHTH AVENUE, ROOM 5300  
EUGENE, OREGON 97401

RE: PCUN v. Noem, 6:25-cv-699-AA

Judge Aiken,

On July 17, 2025, the parties conferred about Plaintiffs' then-forthcoming motion for leave to amend and supplement the complaint in this matter. Defendants requested a redlined version, which Plaintiffs provided on September 4, 2025. Plaintiffs had represented to the Court that they would file their motion today, September 5, 2025. Modest additional time is needed for the parties to complete conferring. The parties have scheduled time to confer on September 9 in the morning, following which Plaintiffs anticipate filing the motion.

Sincerely,  
INNOVATION LAW LAB

*/s/ Stephen W Manning*  
STEPHEN W MANNING  
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cc: Patrick Conti, Assistant U.S. Attorney (via CM/ECF)