AHILAN T. ARULANANTHAM, SBN 237841 1 MARK D. ROSENBAUM, SBN 59940 ACLU FOUNDATION OF SOUTHERN CALIFORNIA **ORIGINAL** 2 1616 Beverly Boulevard Los Angeles, CA 90026-5752 Telephone: (213) 977-9500 3 FILFD Facsimile: (213) 250-3919 4 CLERK, U.S. DISTRICT COURT **BRADLEY S. PHILLIPS SBN 85263** 5 NOV 2 9 2007 STEPHEN M. KRISTOVICH SBN 82164 FRED A. ROWLEY, JR. SBN 192298 FADIA RAFEEDIE KHOURY SBN 230192 WESLEY T. SHIH SBN233531 6 CENTRAL DISTRACL OF CALIFORNIA 7 DEPUTY MUNGER, TOLLES & OLSON LLP 355 South Grand Avenue 8 Thirty-Fifth Floor Los Ángeles, CA 90071-1560 Telephone: (213) 683-9100 Facsimile: (213) 687-3702 9 **Priority** Send 10 Enter Closed Attorneys for Plaintiffs 11 JS-5/JS-6 JS-2/JS-3 -Scan Only-12 UNITED STATES DISTRICT COURT 13 CENTRAL DISTRICT OF CALIFORNIA 14 15 CASE NO. CV07-3977 TH (CTx) AMADOU LAMINE DIOUF, RAYMOND SOEOTH, individually 16 JOINT STIPULATION AND ORDER and on behalf of all others similarly REQUESTING STAY OF ALL 17 situated. **PROCEEDINGS** Plaintiffs, 18 19 VS. MICHAEL CHERTOFF, SECRETARY OF DHS, NEIL 20 SAMP\$ON, INTERIM DIRECTOR 21 OF DRES JOHN DOES 1-4 (FEDERAL OFFICIALS WITHIN 22 THE DEPARTMENT OF HOMELAND SECURITY AND DIVISION OF IMMIGRATION 23م HEALTH SERVICES), DAVID MARTIN, RN, DR. TÖBE PROPST, 25 MINERVA STEVENSON, JOHN DOES 5-7 (ICE OFFICERS OR 26 PRIVATE SECURITY OFFICERS), JOHN TORRES, DIRECTOR OF ICE 27 OFFICE OF DETENTION AND REMOVAL, ANTHONY TANGEMAN, FORMER DIRECTOR 28

Case 2:07-cv-03977-TJH-CT Document 56 Filed 11/29/2007 Page 2 of 6 OF ICE OFFICE OF DETENTION AND REMOVAL, JOHN DOES 8-10 (FEDERAL OFFICIALS WITHIN THE DEPARTMENT OF HOMELAND SECURITY AND DIVISION OF IMMIGRATION
HEALTH SERVICES), JEFFRY
BRINKLEY, JOHN DOE 11 (A
PHYSICIAN), MARK PORTER,
JOHN DOE 12 (AN ICE OFFICER),
JOHN DOES 13-14 (FEDERAL
OFFICIALS WITHIN THE DIVISION OFFICIALS WITHIN THE DIVISION OF IMMIGRATION HEALTH SERVICES) Defendants.

1 2

3

4

5

6

7

8

9

10

11

JOINT STIPULATION AND ORDER REQUESTING STAY OF ALL PROCEEDINGS

The parties hereby jointly request that this Court stay all litigation in this case, including all briefing deadlines and discovery obligations, from November 26, 2007 until December 16, 2007. If the parties wish to continue the stay beyond that date, they will inform the Court by separate filing. The parties are filing this joint stipulation because they have entered into an agreement that is memorialized in correspondence dated November 26, 2007. The agreement includes a requirement that the parties engage in good-faith mediation in an attempt to resolve all claims in this case.

It is so stipulated.

Dated: November 26, 2007

Dated: November 26, 2007

12

13

14

15

16

17

18

19

20

2122

23

24

25

2627

28

ACLU OF SOUTHERN CALIFORNIA MUNGER, TOLLES & OLSEN, LLP

AHILAN T. ARULANANTHAM

Attorneys for Plaintiffs

JEFFREY S. BUCHOLTZ
Assistant Attorney General,
Civil Division
THOMAS P. O'BRIEN
United States Attorney
ROBERT L. LESTER
Assistant United States Attorney
DAVID J. KLINE

Principal Deputy Director Office of Immigration Litigation

GJON JUNCAJ
Trial Attorney

00 000

HERYR GLASER

Trial Attorney

Office of Immigration Litigation

Attorneys for Defendants

IT IS SO ORDERE

Dated

United States District Judge

1

Case 2:07-cv-03977-TJH-CT Document 56 Filed 11/29/2007 Page 4 of 6 IT IS SO ORDERED. Dated: November ____, 2007 HONORABLE TERRY J. HATTER United States District Judge

PROOF OF SERVICE

2

3

1

4 5

6

7

8

9

10

11

12

13

14 15

16

17

18

19

20

21

22 23

24

25

27

26

28

Email: arthur.rizer@usdoj.gov

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 1616 Beverly Boulevard, Los Angeles, California 90026. I am employed in the office of a member of the bar of this court at whose direction the service was made.

On November 26, 2007November 26, 2007, I served the foregoing document:

JOINT STIPULATION AND ORDER REQUESTING STAY OF ALL PROCEEDINGS

on the parties in this action by placing a true and correct copy of each document

thereof, enclosed in a sealed envelope, addressed as follows:

Sheri Glaser

U.S. Department of Justice

Office of Immigration Litigation

529 14th Street, NW

National Press Building

Room 1148-14

Washington, DC 20530

Email: sheri.glaser@usdoj.gov

Gjon Juncaj

U.S. Department of Justice

Office of Immigration Litigation

P.O. Box 878, Ben Franklin Station

Washington, DC 20044

Email: gjon juncaj@usdoj.gov

Arthur Rizer

U.S. Department of Justice

Office of Immigration Litigation

P.O. Box 878, Ben Franklin Station

Washington, DC 20044

1 C. Barrington Wilkins U.S. Department of Justice 2 Office of Immigration Litigation 3 P.O. Box 878, Ben Franklin Station Washington, DC 20044 4 Email: c.barrington.wilkins@usdoj.gov 5 Mary H. Mason 6 Civil Division, Torts Branch 7 Constitutional Tort Litigation Section P.O. Box 7146 8 Washington, D.C. 20044 9 Email: mary.mason@usdoj.gov 10 Edward J. Martin 11 Civil Division, Torts Branch Constitutional Tort Litigation Section 12 P.O. Box 7146 13 Washington, D.C. 20044 Email: edward.martin2@usdoj.gov 14 15 Robert I. Lester Office of the U.S. Attorney 16 300 North Los Angeles Street 17 Los Angeles, CA 90012 Email: Robert.Lester@usdoj.gov 18 I am readily familiar with the business' practice of collection and processing 19 correspondence for mailing with the United States Postal Service. I know that the 20 correspondence is deposited with the United States Postal Service on the same day 21 this declaration was executed in the ordinary course of business. I know that the 22 envelope was sealed and, with postage thereon fully prepaid, placed for collection 23 and mailing on this date, following ordinary business practices, in the United States 24 mail at Los Angeles, California. 25 Executed on November 26, 2007, at Los Angeles, California. 26 27 Geneva Tien 28