

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

JOINT MOTION TO CONTINUE  
INITIAL CASE MANAGEMENT  
CONFERENCE

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**JOINT MOTION**

Pursuant to Civil Local Rule 16-2(d), the parties, by and through their undersigned counsel, respectfully move the Court to continue the initial case management conference and corresponding Case Management and ADR Deadlines until after the Court has resolved Defendants' pending motion to dismiss, Dkt. No. 22. In support of this Joint Motion, the parties stipulate and agree as follows:

1. Plaintiffs filed their original complaint in this Court on January 28, 2017. Dkt. No. 1. On February 1, 2017, the Court dismissed the complaint due to lack of subject matter jurisdiction. Dkt. No. 11. Plaintiffs filed an amended complaint on March 10, 2017. Dkt. No. 21. Defendants filed a motion to dismiss the case in its entirety on April 3, 2017. Dkt. No. 22.

2. On January 30, 2017, the Court entered an Order Setting Initial Case Management Conference and ADR Deadlines. Dkt. No. 6. Pursuant to that Order, an Initial Case Management Conference has been set for May 4, 2017, with related Case Management and ADR Deadlines set for April 13 and April 27, 2017.

3. Pursuant to Civil Local Rule 16-2(d), counsel for the parties have conferred and, in an effort to preserve the resources of the Court and of the parties, wish to continue the Initial Case Management Conference and corresponding Case Management and ADR deadlines until after the Court has resolved Defendants' pending motion to dismiss. Defendants' motion may dispose of all claims asserted by Plaintiffs, and the parties respectfully submit that it would be premature to address certain preliminary issues until after the Court has determined whether it has subject matter jurisdiction over this case.

4. Pursuant to Civil Local Rule 16-2(d)(3)-(4), the parties have agreed to, and request that the Court approve, the following proposed case management schedule:

- **Two weeks after Court's Order on motion to dismiss:** Deadline to (a) meet and confer pursuant to Fed. R. Civ. P. 26(f) and ADR L.R. 3-5; (b) file ADR Certification; and (c) file either Stipulation to ADR Process or Notice of Need for ADR Phone Conference.
- **Four weeks after Court's Order on motion to dismiss:** Deadline to file Rule 26(f) Report and Joint Case Management Statement.
- **Five weeks after Court's Order on motion to dismiss:** Initial Case Management Conference.

5. Pursuant to Local Rule 5-1(i)(3), counsel for Defendants attests that he has obtained the concurrence in the filing of the document from counsel for Plaintiffs.

DATED: April 6, 2017

Respectfully submitted,

CHAD A. READLER

Acting Assistant Attorney General

JOHN R. TYLER

Assistant Branch Director

/s/Andrew W. Shalaby

ANDREW W. SHALABY

(Cal. Bar No. 206841)

East Bay Law

1417 Solano Ave.

Albany, CA 94706

Telephone: (510) 551-8500

Facsimile: (510) 725-4950

E-mail: andrew@eastbaylaw.com

Attorney for Plaintiffs

People of the United States

of America and the State

of California

/s/Stuart J. Robinson

STUART J. ROBINSON

(Cal. Bar No. 267183)

Trial Attorney

U.S. Department of Justice

Civil Division, Federal Programs Branch

450 Golden Gate Ave.

San Francisco, CA 94102

Telephone: (415) 436-6635

Facsimile: (415) 436-6632

E-mail: stuart.j.robinson@usdoj.gov

Attorneys for Defendants

Donald Trump; United States of America

JOINT MOTION TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE

Case No. 3:17-cv-00451-JD

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

PEOPLE OF THE UNITED STATES  
OF AMERICA AND THE STATE  
OF CALIFORNIA,

Plaintiffs,

v.

DONALD TRUMP; UNITED  
STATES OF AMERICA

Defendants.

Case No. 3:17-cv-00451-JD

**[PROPOSED] ORDER**

This matter comes before the Court on the parties' Joint Motion to Continue Initial Case Management Conference. Upon consideration of the parties' motion and of all materials submitted in relation thereto, it is hereby

ORDERED that the parties' motion is GRANTED.

The Court HEREBY ORDERS the following revisions to the case management schedule:

1. **Two weeks after Court's Order on motion to dismiss:** Deadline to (a) meet and confer pursuant to Fed. R. Civ. P. 26(f) and ADR L.R. 3-5; (b) file ADR Certification; and (c) file either Stipulation to ADR Process or Notice of Need for ADR Phone Conference.
2. **Four weeks after Court's Order on motion to dismiss:** Deadline to file Rule 26(f) Report and Joint Case Management Statement.
3. **Five weeks after Court's Order on motion to dismiss:** Initial Case Management Conference.

IT IS SO ORDERED.

Date: \_\_\_\_\_

JAMES DONATO  
United States District Judge

JOINT MOTION TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE  
Case No. 3:17-cv-00451-JD