

MATHEW W DOS SANTOS, OSB 155766

mdossantos@aclu-or.org

KELLY K SIMON, OSB 154213

ksimon@aclu-or.org

AMERICAN CIVIL LIBERTIES UNION

FOUNDATION OF OREGON

PO Box 40105

Portland OR 97240

503.241.0035 (tel)

503.241.7733 (fax)

Attorneys for Plaintiff

STEPHEN W MANNING, OSB 01337

smanning@ilgrp.com

JENNIFER M ROTMAN, OSB 04134

jrotman@ilgrp.com

JESSICA M BOELL, OSB 020220

jboell@ilgrp.com

IMMIGRANT LAW GROUP PC

PO Box 40105

Portland OR 97240

503.241.0035 (tel)

503.241.7733 (fax)

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

[PORTLAND DIVISION]

UNITE OREGON,

Plaintiff,

Case No. 3:17-CV-00179-PK

v.

Donald J TRUMP, President of the
United States;
U.S. DEPARTMENT OF
HOMELAND SECURITY (“DHS”);
U.S. CUSTOMS AND BORDER
PROTECTION (“CBP”);
John KELLY, Secretary of DHS;
Kevin K MCALEENAN,
Acting Commissioner of CBP;
John D BARNES, CBP Area
Director, Port of Portland,

Joint Motion to Administratively
Close

Defendants.

The parties jointly move the court to enter an order administratively closing this matter until the resolution of the related litigation in *Int’l Refugee Assistance Project v. Trump*, __ F.3d __, 2017 WL 2273306 (CA4 May 31, 2017), *cert. docketed*, No. 16-1436 (June 1, 2017), and *Hawaii v. Trump*, No. 1:17-cv-0050 (D. Haw.), provided that, at any time, the filing of a motion by either party or the entry of an order by the court would reopen the matter and return it to the docket. Additionally, unless otherwise ordered by the court, the parties agree that if Plaintiff moves to amend its complaint, Defendants will have 60 days to answer or otherwise respond to the amended complaint.

Respectfully submitted on June 15, 2017,

FOR THE PLAINTIFF:

/s/ Stephen W Manning
STEPHEN W MANNING
IMMIGRANT LAW
GROUP PC
333 SW Fifth Avenue
Suite 525
Portland, OR 97204
503.241.0035 (tel)
503.241.7733 (fax)
smanning@ilgrp.com

/s/ Mathew W Dos Santos
MATHEW W DOS SANTOS
AMERICAN CIVIL
LIBERTIES OF OREGON
PO Box 40105
Portland OR 97240
503.241.0035 (tel)
503.241.7733 (fax)

Attorneys for Plaintiff

FOR THE DEFENDANTS:

CHAD A. READLER
Acting Assistant Attorney
General
Civil Division

WILLIAM C. PEACHEY
Director
District Court Section
Office of Immigration Litigation

GISELA A. WESTWATER
Assistant Director
District Court Section
Office of Immigration Litigation

/s/ Genevieve M. Kelly
GENEVIEVE M. KELLY
Trial Attorney
District Court Section
Office of Immigration Litigation
U.S. Department of Justice
P.O. Box 868
Ben Franklin Station
Washington, DC 20044
(202) 532-4705
Va. Bar No. 86183
genevieve.m.kelly@usdoj.gov

Attorneys for Defendants