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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

East Bay Sanctuary Covenant, *et al.*,

Plaintiffs,

v.

Donald J Trump, *et al.*,

Defendants.

No. 4:18-cv-06810-JST

**CONSENT MOTION TO
CONTINUE CASE MANAGEMENT
CONFERENCE**

Conference: June 28, 2022
Time: 2:00 PM
Judge: Hon. Jon S. Tigar

East Bay Sanctuary Covenant, *et al.*,

Plaintiffs,

v.

William Barr, *et al.*,

Defendants.

No. 4:19-cv-04073-JST

**CONSENT MOTION TO
CONTINUE CASE MANAGEMENT
CONFERENCE**

Conference: June 28, 2022
Time: 2:00 PM
Judge: Hon. Jon S. Tigar

1 Defendants, by and through undersigned counsel, respectfully request that the Court
 2 continue the case management conference presently scheduled for June 28, 2022 at 2:00 p.m. to
 3 a future date convenient to the Court not during the week of June 27, 2022. Plaintiffs consent to
 4 this motion. In support of this motion, Defendants state as follows:

5 1. These cases challenge two rules, an interim final rule, “Aliens Subject to a Bar on
 6 Entry Under Certain Presidential Proclamations; Procedures for Protection Claims,” 83 Fed. Reg.
 7 55,934 (November 9, 2018) (“entry” rule), and the final rule titled “Asylum Eligibility and
 8 Procedural Modifications,” 85 Fed. Reg. 82,260 (December 17, 2020) (“transit” rule).

9 2. As explained in the parties’ joint case management statement, the two rules are
 10 presently enjoined, and are being are being modified or rescinded. The parties therefore believe
 11 that the Court should continue to hold these cases in abeyance pending the conclusion of the
 12 Departments’ review of the rules, continue the case management conference, and order the parties
 13 to submit 60-day recurring status reports. *See* Case Management Statement at 1-2.

14 3. However, should the Court wish to proceed with litigation in these two cases, and
 15 wishes to proceed with the case management conference, undersigned Defendants’ counsel is
 16 presently scheduled to take previously unscheduled leave the week of June 27, 2022, and so will
 17 not be able to attend the case management conference.

18 4. Undersigned counsel can be available at the Court’s convenience beginning July
 19 5, 2022.

20 5. Defendants nevertheless can be present at the June 28, 2022 conference if that is
 21 the only date the Court’s wishes to hold the conference, but will be represented by new counsel
 22 that will need to acquaint themselves with the history and issues presented in these cases.
 23 Defendants regret and apologize for any inconvenience this may cause the Court or the parties.

24 Accordingly, Defendants respectfully request that should the Court not continue to hold
 25 these cases in abeyance, the Court continue the case management conference to a future date.

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Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

WILLIAM C. PEACHEY
Director

By: /s/ Erez Reuveni
EREZ REUVENI
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Dated: June 23, 2022

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on June 23, 2022, I electronically filed the foregoing document with the Clerk of the Court for the United States Court of for the Northern District of California by using the CM/ECF system. Counsel in the case are registered CM/ECF users and service will be accomplished by the CM/ECF system.

By: /s/ Erez Reuveni
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