## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

<b>TAHIRIH</b>	JUSTICE	CENTER,	et al

Plaintiffs,

v.

ALEJANDRO MAYORKAS, et al.,

Defendants.

Civil Action No. 1:21-cv-124-TSC

JOINT NOTICE AND PROPOSED BRIEFING ORDER

## **NOTICE**

On March 4, 2024, the Court granted Plaintiffs' motion to partially lift the stay of proceedings and ordered the parties to "meet, confer, and file a Joint Status Report by April 12, 2024 with a proposed briefing schedule for moving the case forward as to Plaintiffs' Counts One through Three." ECF 54 at 11. The parties have met and conferred and propose to file motions for summary judgment as set forth in the below briefing schedule:

- Plaintiffs shall file their motion for summary judgment by May 31, 2024;
- Defendants shall file their opposition to Plaintiffs' motion and their cross-motion for summary judgment by July 2, 2024;
- Plaintiffs shall file their reply in support of their motion and their opposition to Defendants'
   motion by August 8, 2024; and
- Defendants shall file their reply in support of their cross-motion by August 30, 2024.

Respectfully submitted,

By: /s/ Gary DiBianco

Gary DiBianco (D.C. Bar No. 458669) Shirley Diaz (D.C. Bar No. 1656347) 1440 New York Avenue, NW Washington, DC 20005 Phone: (202) 371-7000 Gary.DiBianco@probonolaw.com

Eryn Hughes (pro hac vice) One Manhattan West New York, NY 10001

Co-Counsel for Plaintiffs

Elizabeth B. Wydra (D.C. Bar No. 483298) Brianne J. Gorod (D.C. Bar No. 982075) Brian R. Frazelle (D.C. Bar No. 1014116) Constitutional Accountability Center By: /s/ *Christina P. Greer* 

CHRISTINA P. GREER
Senior Litigation Counsel
U.S. Department of Justice, Civil Division
P.O. Box 878, Ben Franklin Station
Washington, DC 20044
Tel. (202) 598-8770
Christina.P.Greer@usdoj.gov

Counsel for Defendants

1200 18th Street NW Suite 501 Washington, DC 20036 Phone: (202) 296-6889

Co-Counsel for Plaintiffs

Dated: April 12, 2024

## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

TAHIRIH JUSTICE CENTER, et al.,				
Plaintiffs,	G' '1 A d' N. 1 21 124 TGG			
v.				
ALEJANDRO MAYORKAS, et al.,	Civil Action No. 1:21-cv-124-TSC			
Defendants.				
[PROPOSED] ORDER				
Upon consideration of the parties' joint notice, it is hereby ORDERED that Plaintiffs				
shall file their motion for summary judgment by May 31, 2024; Defendants shall file their				
opposition to Plaintiffs' motion and their cross-motion for summary judgment by July 2, 2024;				
Plaintiffs shall file their reply in support of their motion and their opposition to Defendants'				
motion by August 8, 2024; and Defendants shall file their reply in support of their cross-motion				
by August 30, 2024.				
SO ORDERED.				
Date:				
by August 30, 2024. SO ORDERED.	TANYA S. CHUTKAN United States District Judge			