IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

The STATE of TEXAS, et al.,

Plaintiffs,

v.

Civil Action No. 3:22-cv-00780-M

JOSEPH R. BIDEN JR., in his official capacity as President of the United States, *et al.*,

Defendants.

JOINT STATUS REPORT REGARDING JURISDICTIONAL DISCOVERY

Pursuant to the Court's Order of August 22, 2022, ECF No. 50, the parties jointly provide the Court with an update on the status of jurisdictional discovery.

Since the last update to the Court, the parties have continued to confer regarding the written discovery requests exchanged on March 1, 2023. In order to provide some necessary additional time to compile discovery responses and to confer internally regarding the case schedule moving forward and the impact of the recent Federal Register Notice ("FRN") regarding the Central American Minors Program on the claims in this case, the parties have agreed to move their deadline to reciprocally serve their responses and objections to August 15, 2023.

In light of this activity, the parties respectfully request that the Court continue the stay governing this matter and continue to hold all pending deadlines in abeyance. The parties will file a joint status report providing a further update on the progress of jurisdictional discovery on or by August 15, 2023.

Dated: July 17, 2022 Respectfully submitted,

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Certificate of Service

On July 17, 2023, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Joseph A. Darrow
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U.S. Department of Justice