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 9
10
                         UNITED STATES DISTRICT COURT
11
                    FOR THE CENTRAL DISTRICT OF CALIFORNIA
12
                                EASTERN DIVISION
13
    UNITED STATES OF AMERICA,
                                        No. 2:20-CV-07309-RSWL (JC)
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              Plaintiff,
                                         STIPULATION TO (1) SCHEDULE THE
                                        EXTRADITION HEARING AND
15
                                        BRIEFING, (2) ALLOW THE FILING OF
                   v.
                                        OVER LENGTH BRIEFS, (3) ALLOW
                                        THE UNITED STATES TO FILE A
16
    TAHAWWUR HUSSAIN RANA,
                                        REDACTED VERSION OF THE
17
              A Fugitive from the
                                        EXTRADITION REQUEST
                                        ELECTRONICALLY; AND (4) TAKE THE
              Government of the
18
              Republic of India.
                                        STATUS CONFERENCE OFF CALENDAR;
                                        [Proposed] ORDER
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2.1
         Plaintiff, United States of America, by and through its counsel
22
    of record, the United States Attorney and Assistant United States
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    Attorney John J. Lulejian, and relator TAHAWWUR HUSSAIN RANA, by and
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    through his counsel of record, John D. Cline, Esq. and Patrick W.
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Blegen, Esq., respectfully request this Court to schedule the

extradition hearing for January 8, 2021, at 11:00 a.m. The parties

further request this Court to set the briefing schedule as follows:

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- 1. The United States must file its Memorandum in Support of the Request for Extradition on or before September 28, 2020;
- 2. Relator must file his Opposition to the Request for Extradition on or before November 20, 2020; and

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- 3. The United States must file its Reply Memorandum in Support of the Extradition Request on or before December 23, 2020.
- 4. The parties also respectfully request that the Court allow them to file over length memoranda, not to exceed 50 pages excluding indices and exhibits, in support of or in opposition to the Extradition Request.
- 5. The parties further respectfully request that the Court grant the United States leave to file a redacted version of the Extradition Request to CM/ECF without first having to comply with the requirements of Local Rule 79-5.2.2.
- 6. The parties also respectfully request that the Court take the Status Conference scheduled for August 21, 2020, at 1:00 p.m. off calendar.
- 7. The parties have met and conferred and believe that the proposed dates will allow for the prompt resolution of this extradition matter. Further, they recognize that given the size of the Extradition Request and the number of charges alleged by India in that request, a thorough briefing of the issues before the Court will require them to file briefs in excess of 25 pages, as required by the Local Rules. Finally, the parties have discussed redactions to the Extradition Request and agree that personal identifying information must be redacted. The parties further agree that allowing the United States to file the Redacted Extradition Request directly to CM/ECF, without first having to comply with the procedures set forth

in Local Rule 79-5.2.2, will make the lengthy document available to 1 2 the public quickly and avoid taxing the limited resources of the 3 Court due to current events. 4 IT IS SO STIPULATED. 5 August 18, 2020 /s/ John J. Lulejian 6 JOHN J. LULEJIAN Date 7 Assistant United States Attorney Attorney for Plaintiff 8 UNITED STATES OF AMERICA 9 10 /s/ John D. Cline (authorized by e-mail) /s/ Patrick W. Blegen (authorized by e-mail) August 18, 2020 11 Date JOHN D. CLINE PATRICK W. BLEGEN 12 Attorneys for Relator TAHAWWUR HUSSAIN RANA 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28

CERTIFICATE OF SERVICE 1 I, JOHN J. LULEJIAN, declare: 2 That I am a citizen of the United States and am employed as an 3 Assistant United States Attorney in Los Angeles County, California; 4 that my business address is the Office of United States Attorney, 5 United States Courthouse, 312 North Spring Street, Los Angeles, 6 California 90012; that I am a member of the State Bar of California 7 and a member of the Bar of the United States District Court for the 8 Central District of California; that I am over the age of eighteen 9 years; and that I am not a party to the above-titled action; 10 That I served copies of the following documents: 11 12 STIPULATION TO (1) SCHEDULE EXTRADITION HEARING AND BRIEFING, (2) ALLOW THE FILING OF OVER LENGTH BRIEFS, (3) ALLOW THE 13 UNITED STATES TO FILE A REDACTED VERSION OF THE EXTRADITION REQUEST ELECTRONICALLY; AND (4) TAKE STATUS CONFERENCE OFF 14 CALENDAR 15 [Proposed] Order 16 17 Service was: 18 ☐ Placed in a closed envelope ☐ Placed in a sealed envelope 19 for collection and interfor collection and mailing via United States mail, 20 office delivery, addressed as follows: addressed as follows: 21 ☐ By hand delivery, addressed \square By facsimile, as follows: 22 as follows: 23 \square By messenger, as follows: \square By Federal Express, as follows: 24 \boxtimes By USAfx, addressed as follows: 25 26 27

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1	John D. Cline, Esq. (<u>cline@johndclinelaw.com</u>)
2	Patrick W. Blegen, Esq. (pblegen@blegengarvey.com)
3	
4	This Certificate is executed on August 18, 2020, at Los
5	Angeles, California.
6	I certify under penalty of perjury that the foregoing is true
7	and correct.
8	/s/ John J. Lulejian
9	JOHN J. LULEJIAN Assistant United States Attorney
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