UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA Civ. No. 17-CV-02835 (DWF/DTS)

Abdisalam Wilwal, *et al.*,

Plaintiffs,

v.

Case No. 0:17-cv-02835 (DWF/DTS)

Kirstjen Nielsen, et al.,

Defendants.

DEFENDANTS' UNOPPOSED MOTION TO CONTINUE THE STAY OF DISCOVERY

Defendants respectfully request that the Court continue the stay of discovery through July 9,

2019, the date of the settlement conference.

- 1. On March 12, 2019, this Court held an initial pretrial conference, during which time the parties agreed to stay discovery in this matter until a settlement conference could be held on the issue of monetary relief.
- 2. The Court indicated during the initial pretrial conference that it was inclined to stay discovery until a settlement conference could be held.
- The Court initially scheduled the settlement conference for May 23, 2019. See Order, Dkt. 83. On March 28, 2019, the Court ordered discovery to be stayed in this matter through May 23, 2019, the date of the settlement conference. See Order, Dkt. 86.
- On May 16, 2019, the Court rescheduled the settlement conference for July 9, 2019. See Am. Order, Dkt. 89.
- 5. Since the Court entered the stay of discovery, the parties have been discussing potential equitable relief as a component of settlement of this matter.

- Continuing the stay of discovery would allow the parties time to focus their efforts on settlement discussions concerning potential equitable relief, in advance of the settlement conference.
- 7. Opposing counsel has authorized counsel for the Government to state that Plaintiffs take no position as to this motion.
- 8. If a hearing would assist the Court in resolving this motion, counsel for Defendants are available to appear at a hearing.

Therefore, Defendants respectfully request that the Court enter an order continuing the stay of discovery through July 9, 2019, the date of the settlement conference.

Dated: May 20, 2019

Respectfully submitted,

ERICA H. MACDONALD United States Attorney

ERIN M. SECORD Asst. United States Attorney Attorney ID Number 0391789 600 U.S. Courthouse 300 South Fourth Street Minneapolis, MN 55415 (612) 664-5600 Erin.Secord@usdoj.gov

JOSEPH H. HUNT Assistant Attorney General Civil Division

JOHN R. TYLER Assistant Branch Director Federal Programs Branch

<u>/s/ Michael Drezner</u> MICHAEL DREZNER Trial Attorney U.S. Department of Justice Civil Division

Federal Programs Branch

VA Bar No. 83836 Tel: (202) 514-4505 michael.l.drezner@usdoj.gov

JAMES G. TOUHEY, JR. Director Torts Branch

ROGER EINERSON Deputy Director Torts Branch

/s/ Jocelyn Krieger

JOCELYN KRIEGER Trial Attorney U.S. Department of Justice Civil Division Torts Branch NJ Bar No.: 065962013 Tel: (202) 616-1679 jocelyn.krieger@usdoj.gov

Attorneys for Defendants