

Defendants also respectfully request that further summary-judgment briefing in this action be stayed for thirty (30) days, i.e., until March 28, 2011, to allow Defendants to undertake a renewed search for responsive records, provide updated Vaughn indices and supporting declarations should they become necessary, and produce all responsive, non-exempt records. Defendants respectfully request that the Court further extend the stay by an additional twenty-one (21) days, i.e., until April 18, 2011, to permit Plaintiff to review Defendants' renewed response to their FOIA requests, at which time Plaintiff, at its option, may file a substitute and/or renewed motion for summary judgment to replace Plaintiff's Motion that is currently pending.

The following revised schedule is thus respectfully proposed:

Defendants undertake a renewed search, provide updated <u>Vaughn</u> indices and supporting declarations as necessary, and produce all responsive, non-exempt records	March 28, 2011
Plaintiff to file a substitute and/or renewed motion for summary judgment, if any	April 18, 2011
Defendants to file an opposition to Plaintiff's substitute/renewed summary judgment motion and cross-move for summary judgment	May 9, 2011
Plaintiff to file a reply memorandum in support of its summary-judgment motion and its opposition to Defendants' cross-motion for summary judgment	May 30, 2011
Defendants to file a reply memorandum in support of their cross-motion for summary judgment	June 20, 2011

A proposed order is submitted concurrently herewith.

Date: February 24, 2011
Washington, D.C.

Respectfully submitted,

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for the District of Columbia

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
AMERICAN IMMIGRATION LAWYERS)	
ASSOCIATION,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:10-cv-01224-EGS
)	
UNITED STATES DEPARTMENT OF)	
HOMELAND SECURITY, <u>et al.</u> ,)	
)	
Defendants.)	
_____)	

[PROPOSED] ORDER

UPON CONSIDERATION of the Defendants’ consent motion to withdraw their motion for summary judgment and to stay further summary-judgment briefing, and for good cause shown, it is hereby:

ORDERED that Defendants’ motion is **GRANTED**; and it is further

ORDERED that the following revised schedule shall govern further proceedings in this action:

- | | |
|---|----------------|
| Defendants shall undertake a renewed search, provide updated <u>Vaughn</u> indices and supporting declarations as necessary, and produce all responsive, non-exempt records | March 28, 2011 |
| Plaintiff shall file a substitute and/or renewed motion for summary judgment, if any | April 18, 2011 |
| Defendants shall file an opposition to Plaintiff’s substitute/renewed summary judgment motion and cross-move for summary judgment | May 9, 2011 |
| Plaintiff shall file a reply memorandum in support of its summary-judgment motion and its opposition to Defendants’ cross-motion for summary judgment | May 30, 2011 |

Defendants shall file a reply memorandum in support
of their cross-motion for summary judgment

June 20, 2011

SO ORDERED.

SIGNED:

Date EMMET
United

G. SULLIVAN
States District Judge