IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS VICTORIA DIVISION

STATE OF TEXAS; STATE OF LOUISIANA,	
Plaintiffs, v.	Civ. Action No. 6:21-cv-00016
The UNITED STATES OF AMERICA, et al.;	
Defendants.	

STIPULATION AND [PROPOSED] ORDER

The parties in the above-captioned matter stipulate to the following scheduling order:

- 1) Plaintiffs shall file their amended complaint, and accompanying motion challenging Defendants' *Guidelines for the Enforcement of Civil Immigration Law* (Sept. 30, 2021), no later than October 22, 2021.
- 2) Defendants shall serve the full certified Administrative Record on Plaintiffs no later than November 4, 2021.
- 3) Defendants shall file their opposition to Plaintiffs' motion challenging Defendants' Guidelines for the Enforcement of Civil Immigration Law (Sept. 30, 2021), no later than November 12, 2021.

4) Plaintiffs shall file their reply memorandum to their motion challenging Defendants' Guidelines for the Enforcement of Civil Immigration Law (Sept. 30, 2021), no later than November 19, 2021.

5) Defendants' shall answer or otherwise respond to Plaintiffs' complaint or amended complaint no later than January 27, 2021.¹

6) The parties may agree to alter any of the above deadlines by agreement. To the extent any of the above deadlines are adjusted by agreement, one of the parties shall file a notice with the Court informing it of the changed deadline.

It is SO ORDERED.

October ___, 2021

Drew B. Tipton United States District Judge

¹ Plaintiffs stipulate to this responsive pleading deadline insofar as it would not have collateral consequences for issues like the availability of discovery or consolidation under Rule 65. Plaintiffs preserve their position that, in the event such issues arise, any delay in filing a responsive pleading should not prejudice the resolution of those issues.

Date: October 19, 2021

KEN PAXTON Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

JUDD E. STONE II Solicitor General Respectfully submitted.

/s/ Patrick K. Sweeten
PATRICK K. SWEETEN
Deputy Attorney General for Special Litigation
Attorney-in-Charge
Texas Bar No. 00798537
Southern District of Texas Bar No. 1829509
patrick.sweeten@oag.texas.gov

WILLIAM T. THOMPSON Deputy Chief, Special Litigation Unit Texas Bar No. 24088531 Southern District of Texas Bar No. 3053077 will.thompson@oag.texas.gov

RYAN D. WALTERS
Special Counsel
Texas Bar No. 24105085
Southern District of Texas Bar No. 3369185
ryan.walters@oag.texas.gov

OFFICE OF THE ATTORNEY GENERAL P.O. Box 12548 (MC-009) Austin, Texas 78711-2548 Tel.: (512) 463-2100 Fax: (512) 457-4410

COUNSEL FOR PLAINTIFF STATE OF TEXAS

JEFF LANDRY LOUISIANA ATTORNEY GENERAL

/s/ Elizabeth B. Murrill
ELIZABETH B. MURRILL
Solicitor General
JOSEPH S. ST. JOHN
Deputy Solicitor General

Louisiana Department of Justice 1885 N. Third St. Baton Rouge, LA 70804 (225) 326-6766 murrille@ag.louisiana.gov stjohnj@ag.louisiana.gov

COUNSEL FOR PLAINTIFF STATE OF LOUISIANA

BRIAN M. BOYNTON Acting Assistant Attorney General

BRIGHAM J. BOWEN Assistant Branch Director

/s/ Adam D. Kirschner

ADAM D. KIRSCHNER

Attorney-in-charge

IL Bar. No. 6286601

Senior Trial Counsel

BRIAN C. ROSEN-SHAUD

ME Bar No. 006018

MICHAEL F. KNAPP

CA Bar No. 314104

KUNTAL CHOLERA

DC Bar No. 1031523

Trial Attorneys

United States Department of Justice

Civil Division, Federal Programs Branch

Tel: (202) 353-9265 Fax: (202) 616-8460

Email: Adam.Kirschner@usdoj.gov

Brian.C.Rosen-Shaud@usdoj.gov Michael.F.Knapp@usdoj.gov Kuntal.Cholera@usdoj.gov Mailing Address: Post Office Box 883 Washington, D.C. 20044

Courier Address 1100 L Street NW, Room 11020 Washington, D.C. 20005

EREZ REUVENI
CA Bar No. 264124
Assistant Director
U.S. Department of Justice
Civil Division, Office of Immigration Litigation
P.O. Box 868, Ben Franklin Station
Washington, D.C. 20044
202-307-4293 (telephone)
Email: Erez.R.Reuveni@usdoj.gov

Counsel for Defendants

DANIEL DAVID HU
Assistant United States Attorney
Chief, Civil Division
State Bar No. 10131415
S.D. I.D. 7959
Southern District of Texas
1000 Louisiana, Suite 2300 Houston, TX 77002
Tel: (713) 567-9000

Fax: (713) 718-3300 Daniel.Hu@usdoj.gov

Local Counsel for Defendants

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on October 19, 2021, which automatically serves all counsel of record who are registered to receive notices in this case.

/s/ Adam D. Kirschner
ADAM D. KIRSCHNER