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1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF CALIFORNIA  
3

4 MS. L, et al.,

5 Petitioners-Plaintiffs,  
6

7 vs.

8 U.S. IMMIGRATION AND CUSTOMS  
9 ENFORCEMENT, et al.,

10 Respondents-Defendants.  
11

Case No. 18cv428 DMS MDD

**JOINT STATUS REPORT**

12  
13 On October 27, 2022, the Court ordered the parties to file a Joint Status Report  
14 (JSR) by December 7, 2022, in anticipation of the status conference scheduled for  
15 11:30 am on December 9, 2022. ECF No. 661. In accordance with this order of the  
16 Court, the parties provide the below JSR.  
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1 **I. DEFENDANTS' POSITIONS<sup>1</sup>**

2 **A. The President's February 2, 2021 "Executive Order on the Establishment**  
3 **of Interagency Task Force on the Reunification of Families"**

4 The parties have entered into settlement negotiations which remain ongoing.  
5 While settlement talks are ongoing, the Family Reunification Task Force (FRTF)  
6 continues its work to reunify families. Since the creation of the FRTF, a total of 563  
7 separated children have been reunified with parents in the U.S and approximately  
8 3,153 people<sup>2</sup> have been paroled as of December 7, 2022. The FRTF continues to  
9 focus on establishing contact with all families and working to increase the rate of  
10 reunifications.  
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13 With regard to ongoing settlement talks, the next formal Settlement  
14 Conference with Magistrate Judge Dembin is scheduled for December 12, 2022.  
15 Issues previously reported by Defendants in joint status reports are now being  
16 addressed by the parties as part of the ongoing settlement negotiations.  
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24 <sup>1</sup> In light of the fact that there have been no new updates regarding implementation of the *M.M.M.*  
25 settlement agreement, Defendants are removing the section of the report regarding such  
26 implementation. Should there be additional developments going forward Defendants will provide  
updates at that time.

27 <sup>2</sup> The number of individuals paroled include additional household members as well as separated  
28 parents or separated children who were already in the U.S. and received parole in place.

1 **II. MS. L. PLAINTIFFS' POSITIONS**

2 **A. Steering Committee Outreach to Sponsors and Parents of Children**

3 The Steering Committee's recent efforts have focused on finding the parents  
4 of 1,198 children.<sup>3</sup> For 1,078 out of the 1,198, the Steering Committee has reached  
5 the parents (or their attorneys), or otherwise resolved the cases. This is an increase  
6 of 14 children's parents since our last status report. We continue to try to reach the  
7 parents of the remaining 120 children. Most children's parents in this group of 120  
8 —87—are believed to have been removed from the United States following  
9 separation from their children; 33 children's parents are believed to be in the United  
10 States. For two of the children whose parents are believed to have been removed  
11 from the United States, the government has not provided a phone number for the  
12 parent, child, sponsor or attorney.  
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16 *Steering Committee Efforts to Locate Parents*

17 Previous JSRs have reported at length the Steering Committee's efforts to find  
18 parents. Those efforts continue.  
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25 <sup>3</sup> Past JSRs have explained at greater length that this group included expanded class  
26 members and some original class members. Because some of the parents of these  
27 children entered with more than one child, there are 1,082 parents in this combined  
28 group.

1 **III. MMM-Dora Plaintiffs' Report Regarding Settlement Implementation**

2 The parties continue to work together to implement the Settlement Agreement  
3 approved on November 15, 2018. Class counsel will continue to provide the  
4 Government with any additional waiver forms received from class members. The  
5 parties will meet and confer if any issues related to settlement implementation arise.  
6

7 DATED: December 7, 2022

Respectfully submitted,

8 /s/ Lee Gelernt

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