

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

HERITAGE FOUNDATION et. al,

*Plaintiffs,*

v.

U.S. DEPARTMENT OF HOMELAND  
SECURITY

*Defendant.*

Civil Action No. 23-1198 (CJN)

**JOINT STATUS REPORT**

Pursuant to the Court’s May 11, 2023 Minute Order, Plaintiffs The Heritage Foundation and Mike Howell (“Plaintiffs”) and Defendant the U.S. Department of Homeland Security (“Defendant”) respectfully submit the following joint status report regarding Plaintiffs’ Motion for Preliminary Injunction.

1. The parties propose that Defendant’s opposition to Plaintiff’s motion (ECF No. 10) be due on May 26, 2023 and that Plaintiff’s reply be due on June 2, 2023.

2. The parties request a hearing on the motion. The parties are generally available June 6-9, 2023 for a hearing.

3. The parties do not anticipate any disputes of fact at this time between their respective declarants and do not believe that an evidentiary hearing will be necessary.

4. Because Plaintiffs do not have complete knowledge of the position Defendant intends to take in its Opposition, Plaintiffs reserve the right to supplement the evidentiary record. Should Plaintiffs feel supplementation is necessary they will immediately notify counsel for Defendant and the Court.

Dated: May 15, 2023

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