

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

M.A., *et al.*,

Plaintiffs,

v.

ALEJANDRO MAYORKAS, *et al.*,

Defendants.

Civil Action No. 1:23-cv-01843-TSC

JOINT STIPULATION TO HOLD CASE IN ABEYANCE

STIPULATION

The parties have met and conferred and agree that these proceedings, including the pending motions for summary judgment, should be held in abeyance. The parties are engaged in discussions regarding implementation of the challenged rule and related policies and whether a settlement could eliminate the need for further litigation, and the parties believe an abeyance will facilitate such discussions. The parties further propose to submit a status report to the Court within 60 days, updating the Court on the status of the parties' efforts and any intervening circumstances that may impact the litigation. Finally, the government has agreed not to remove any of the noncitizen plaintiffs currently present in the United States pending resolution of their claims.

This Joint Stipulation is without prejudice to either side requesting, prior to the filing of the 60-day status report, to have the case recalendared.

Respectfully submitted,

By: /s/ Cody Wofsy
Cody Wofsy
American Civil Liberties Union
Immigrants' Rights Project
425 California Street, 7th Floor
San Francisco, CA 94104
415-343-0785
cwofsy@aclu.org

Counsel for Plaintiffs

By: /s/ Christina P. Greer
CHRISTINA P. GREER
Senior Litigation Counsel
U.S. Department of Justice, Civil Division
P.O. Box 878, Ben Franklin Station
Washington, DC 20044
Tel. (202) 598-8770
Christina.P.Greer@usdoj.gov

Counsel for Defendants

Dated: February 5, 2024