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Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

VICTORIA LAW,
Plaintiff,

v.

FEDERAL BUREAU OF PRISONS,
Defendant.

Case No. 4:24-CV-06628-AGT

JOINT CASE MANAGEMENT STATEMENT

Date: April 10, 2026
Time: 2:00 p.m.
Courtroom: Via Zoom Videoconference

The parties to the above-captioned action jointly submit this joint case management statement (“JCMS”) in advance of the Case Management Conference (“CMC”) set for April 10, 2026, pursuant to the Court’s March 6, 2026 Minute Entry (Dkt. 71).

1 **2. Facts**

2 **Plaintiff's Statement:** Five days after this Conference marks the two-year anniversary of Dublin's
3 shutdown and the deadline to file a Federal Tort Claim seeking accountability for it. If production
4 continues at the present rate, many of the BOP staff sentenced for the abuse will have completed their
5 sentences before production is finished.¹ This case is not an abstract dispute about page counts and
6 document formats. Plaintiff is a journalist reporting on the closure of FCI Dublin, the systemic sexual
7 abuse there, and the ongoing consequences for survivors who were transferred, many with pending
8 immigration proceedings or seeking compassionate release or other relief. BOP knows timely access is
9 essential, yet its delays undermine survivors' ability to obtain relief, present evidence, and hold decision
10 makers accountable, while also stripping reporting of practical value. By April 3, 2026, 618 days after
11 Plaintiff was entitled to a determination on her request, BOP has not established the universe of
12 responsive records, has met only 4 of 14 applicable production deadlines, and has left three production
13 periods entirely unfulfilled.² Nearly 50 percent of the released pages were already publicly available
14 under BOP's affirmative disclosure obligations pursuant to 5 U.S.C. § 552(a)(2), rather than newly
15 produced in response to Plaintiff's § 552(a)(3) request. Email production, the only category for which
16 BOP has provided search terms, is projected to extend into 2031. Plaintiff has repeatedly circulated
17 written agendas and narrowing proposals to streamline production and facilitate compliance. Those
18 efforts have not altered BOP's positions, including that these issues are not subject to judicial resolution
19 until production is complete. Nothing about this case required BOP to wait until March 20, 2026, more
20 than 600 days after the request was filed, to begin sharing information that existed from the outset and
21 could have been provided at any time. The fact that BOP, on the eve of the first case management

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23 ¹According to PACER records and DOJ announcements, Enrique Chavez and Ross Klinger appear to
24 have been released from custody. Garcia and Bellhouse are scheduled for release in 2027, Highhouse
25 and Nunley in 2028 or 2029, and Jones between 2030 and 2031.

26 ² Plaintiff will submit (Dkt. 74) a Declaration and exhibits in support of her Letter Brief regarding
27 Defendant's compliance with the Court's May 30, 2025 Production Order, which summarize BOP's
28 production activity, outstanding obligations, and the status of the parties' agreements and Plaintiff's
narrowing efforts, including Exhibit 1, Status of Agreements and Plaintiff's Narrowing, Exhibit 2,
Categories of Agreements, Exhibit 3, Missing Information and Productions as of March 2026, Exhibit 4,
Categories of Records Produced and Withheld, Exhibit 5, Categories of Records Produced and
Withheld, and Exhibit 6, FOIA Release Timelines and Page Counts; Plaintiff will also submit a Letter
Brief regarding production format. (Dkt. 75)

1 conference, agreed to meet, underscores that progress has been driven by impending Court oversight,
2 which continues to be necessary to progress and resolve the case.

3 On March 18, 2026, Plaintiff sent drafts of production dispute filings and the JCMS and
4 proposed an agenda for the March 20 meet and confer.³ BOP did not agree to discuss those 25
5 items. BOP did not provide page counts, search terms, and generally did not identify systems searched,
6 nor did it commit to timelines or positions. BOP declined to state which records it would produce in
7 March. BOP declined to state when it would produce the records for the months it was ordered to
8 produce and has not yet produced. BOP's participation was largely limited to asking Plaintiff to narrow
9 requests without providing the information Plaintiff stated was necessary to make informed narrowing
10 decisions. Parties agreed on plaintiff narrowing 10 items, 8 items required Plaintiff to follow up, 16
11 items required BOP follow up, and no agreement was reached on 10 items. BOP did not agree to a date
12 for providing Plaintiff with responses. BOP did not agree to a date for the next meeting. On March 29
13 Plaintiff received the first follow-up from BOP. Although BOP agreed during the meet and confer to
14 follow up on 16 specific items, this communication does not address any of those items, provide any of
15 the promised information or clarification, or state BOP's positions on the outstanding disputes. Instead,
16 BOP again limits its response to requesting further narrowing. In the second email, BOP refused to
17 agree to Plaintiff's proposed timing for filing or share information about when Plaintiff would receive
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19 ³ Items included Plaintiff's proposed joint schedule; whether BOP disputes facts related to production
20 timing; whether BOP is in compliance with the May 30, 2025 Production Order; whether BOP complied
21 with monthly production requirements and notice obligations; whether BOP disputes missing
22 productions on specific dates; whether BOP disputes facts related to production format and its position
23 regarding production in native format with metadata; and, for purposes of the Joint Case Management
24 Statement: whether BOP agrees with Plaintiff's characterization of its positions, whether those positions
25 have changed, whether they are maintained, when BOP will take positions if it has not yet done so, and
26 whether further meet-and-confer would alter them. Plaintiff also requested that BOP address a series of
27 asserted legal positions, including its positions regarding the scope and timing of email production, its
28 obligations to issue determination letters, provide estimated completion dates, complete searches by a
date certain, communicate timelines, and provide detailed explanations for withholdings. Plaintiff
further asked whether BOP disputes that delay constitutes unlawful withholding under FOIA, and
whether BOP disputes that it failed to substantively respond to multiple prior written submissions,
including memoranda, emails, and letters spanning December 2024 through February 2026, as well as
issues raised in Releases 9 and 10, tort and property claim productions, and email redactions. Plaintiff
additionally sought information regarding preservation and spoliation, including whether a litigation
hold had been implemented and whether any responsive records had been destroyed or become
inaccessible. Finally, Plaintiff requested information necessary to facilitate narrowing, including what
information BOP could provide regarding the existence, scope, and volume of responsive records.

1 drafts. BOP provided its drafts April 2, 2026, the day before the filing deadline of April 3, 2026. Further
2 meet and confer is unlikely to change BOP's positions on legal issues.

3 **Defendant's Statement:**

4 Plaintiff contends that the the pace of releases ordered by the Court (processing 1000 page per
5 month) "will "undermine survivors' ability to obtain relief, present evidence, and hold decision makers
6 accountable[.]" Plaintiff seems to be forgetting that at the time of her request and when she filed her
7 complaint, the case of *California Coalition for Women Prisoners, et al. v. United States Federal Bureau*
8 *of Prisons, et al.*, 4:23-cv-04155-YGR was scheduled for trial in 2025. Since that time, however, the
9 parties to that litigation signed a consent decree on December 5, 2024. The Court gave final approval of
10 the consent decree on February 27, 2025. ECF No. 473. The Court found that the "[p]arties have
11 negotiated an agreement that provides procedural protections for class members moving forward, and
12 allows for the continuation of the Monitor's work ensuring that, to the extent possible, past harms are
13 rectified. " *Id.* at p. 7.

14 Plaintiff does not represent any of the individuals formerly incarcerated at Dublin. The lawyers
15 that represent the class were able to reach a consent decree in *CCWP* without the need for FOIA
16 documents to either represent the class or settle the case. A simple google search about the former
17 Dublin prison would show thousands of news stories across all forms of media. None of the journalists
18 covering the former Dublin prison needed the documents Plaintiff seeks to report on the story. Plaintiff
19 herself has published numerous articles without needing the documents.

20 Plaintiff's diatribe against BOP is inconsistent with tone by Plaintiff Victoria Law at the March
21 20, 2026, meeting. Indeed, the only result Plaintiff will achieve in misrepresenting the progress made
22 during the March meeting, is for BOP to earnestly believe Plaintiff is not engaging in good faith
23 discussions. The March meeting was incredibly productive, positive, and provided all Parties a path
24 forward. In reading Plaintiff's statement above, the Court is left with a picture of no progress and
25 complete stalwart by BOP. This is not the truth. A key factor in this case, and what makes it unique, is
26 that FCI Dublin is closed. In the usual course, custodians at an operating institution are available to
27 search for and provide records. Here, not only are the records sought from BOP unique, but with the
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1 institution's closure, custodians and records are challenging and time consuming to locate, access and
2 gather. If the Plaintiff desires expedient resolution and production in this case, and does not believe
3 discussions to be fruitful, BOP asks the Plaintiff to review her request and provide greater specificity.
4 Clear from the March discussion was that the Plaintiff does not know what she is searching for, and
5 notwithstanding BOP's generous efforts to assist and understand the request, Plaintiff nonetheless
6 represents to this Court that the Agency is not acting in good faith. What Plaintiff Victoria Law
7 conveniently forgets is that she left the March meeting, stating her intent to talk to her editor and report
8 back on the ability to narrow numerous FOIA requests, yet Plaintiff ignores that and blames BOP. In the
9 interim, BOP has sought additional records responsive to the clarifications reached during the meeting
10 and included these documents in the March 2026, production.

11 Finally, Plaintiff's claim that releases of email is projected to extend into 2031. Again, she
12 ignores what was discussed in the March 20, 2026 meeting. BOP is working to propose different search
13 terms and custodians so that the emails are responsive to Plaintiff's request and substantive, as opposed
14 to irrelevant email.

15 **3. Legal Issues**

16 **Plaintiff's Statement:** This dispute is about whether the Court can meaningfully manage a case where
17 the agency refuses to define the basic parameters a court needs to assess compliance. Plaintiff is
18 effectively operating in the dark while BOP controls the light switch. BOP is the only party that knows
19 the size and shape of the universe of responsive records, and while it withholds that information, BOP
20 demands Plaintiff negotiate blindly while the agency decides if anything becomes visible. From July
21 2024 to March 2026, BOP had ample time to identify custodians, time frames, search locations, and
22 assess the volume of responsive records, yet it did not do so. Instead, it waited until the eve of the first
23 case management conference to agree to a meeting at which it provided only partial visibility. Now it
24 seeks to use that belated disclosure as a basis for further delay. That is not what the statute contemplates.
25 FOIA allows time, in limited circumstances, to review records, but it does not permit an agency to
26 postpone the act of collecting them. BOP already had 637 days to voluntarily determine the scope of the
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1 responsive universe. Until it provides a record count and identifies the custodians and locations
2 searched, any discussion of narrowing continues BOP's pattern of unlawfully shifting the burden to
3 Plaintiff. Plaintiff submitted this request on July 5, 2024. Other than an agreement about email, BOP did
4 not meaningfully engage with some of Plaintiff's requests for information until March 20, 2026, more
5 than 623 days later, and on the eve of court supervision through a Case Management Order. Only BOP
6 possesses the information necessary to define the universe of responsive records, and it cannot fault
7 Plaintiff for lacking specificity while withholding the very details that would make specificity possible
8 and failing to respond to nearly two years of Plaintiff's consistent inquiries. The Court should require
9 the BOP to follow the statute and define and describe the universe of records that only it knows about
10 before asking Plaintiff to further reduce the request she has already narrowed. Once BOP provides the
11 required information Plaintiff and the Court can more accurately assess whether compliance is
12 occurring, production is adequate, and what further narrowing is possible.
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15 Due to BOP's actions, this case has no end in sight. BOP holds the vast majority of the cards.
16 After nearly 30 conferrals, BOP has yet to fulfill its statutory obligation to identify what records are
17 responsive to Plaintiff's expedited processed FOIA request, which exemptions it asserts will apply, and
18 when it plans to produce. BOP's refusal is a deliberate choice to drag the litigation out for years,
19 knowing that by the end, the subject of the records--its historic prison rape scandal--will be history,
20 rather than news that Journalist Victoria Law can report on to secure the survivors' deserved relief from
21 incarceration or deportation. It is also a violation of the statute, which places the burden on the agency
22 to "sustain its action" for withholding records. *See* 5 U.S.C. § 552(a)(4)(B). BOP's approach reflects a
23 conscious choice to block, rather than facilitate, access to the statutorily required records. Rather than
24 engaging in constructive exchanges aimed at narrowing the scope of records at issue, BOP repeatedly
25 ignores or rejects Plaintiff's efforts. Plaintiff repeatedly raises issues with BOP's bad-faith, faux
26 compliance with the Court's Order, such as BOP linking to records already published on its website
27 under the commands of 5 USC 552(a)(2) and claiming it "reviewed" those documents and "produced"
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1 them in satisfaction of the Order. Plaintiff sent a letter and request for conferral with a draft agenda on
2 February 2, 2026 regarding this issue, and BOP did not. substantively respond.⁴ Nor did BOP address
3 the three other letters and requests for conferral Plaintiff sent on that day. BOP's refusal to respond
4 substantively to multiple written objections and proposals or agreed-upon timelines has forced Plaintiff
5 to raise piecemeal disputes in correspondence, meet and confer, letter briefs, and motions-practice rather
6 than resolving the case through the typical FOIA route of summary judgment. BOP does this because it
7 continues to find ways to dodge accountability to the Court. BOP's actions have forced Plaintiff's team
8 to have already worked over 1,000 hours on this case. This debacle of exhausting Plaintiff's and this
9 Court's resources, compounding problems, indefinitely postponing enforcement and remedies Plaintiff
10 is entitled to, and will continue if no order on timing is issued.

11 The governing statute places the burden on BOP to justify its search, production, and any withholdings,
12 yet BOP repeatedly shifts that burden to Plaintiff by refusing to provide basic information necessary to
13 evaluate or narrow requests. Rather than identifying the scope of responsive records, the systems
14 searched, custodians, date ranges, or search terms, BOP asks Plaintiff to narrow requests without
15 disclosing what records exist or how they are maintained. BOP also asserts burden without providing
16 supporting detail, declines to commit to production timelines, and conditions production on actions by
17 Plaintiff, such as obtaining consent or further narrowing categories. By withholding information
18 uniquely within its control and requiring Plaintiff to proceed without it, BOP effectively reverses the
19 statutory framework and places on Plaintiff obligations that the statute assigns to the agency. The
20 information necessary to define that endpoint is uniquely within BOP's control and remains undisclosed.

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22 ⁴ BOP treated Plaintiff's request under 5 U.S.C. § 552(a)(3) as though it could be satisfied by pointing
23 to or reproducing materials already required to be published under different statutory provisions. Instead
24 of conducting a reasonable search for those non-public records, BOP produced materials that were
25 already publicly available on agency websites and that fall within FOIA's proactive disclosure regimes
26 under §§ 552(a)(1) or (a)(2), requiring policy or programmatic materials be posted to a website. FOIA
27 imposes distinct and non-interchangeable obligations. As courts have recognized, §§ 552(a)(1), (a)(2),
28 and (a)(3) establish three independent disclosure regimes, two of which operate entirely apart from the
request-based process at issue in this case. *See Campaign for Accountability v. DOJ.*, 155 F.4th 724, 730
(D.C. Cir. 2025); *See Campaign for Accountability v. U.S. Dep't of Just.*, 278 F. Supp. 3d 303, 307–08
(D.D.C. 2017); *See Citizens for Resp. & Ethics in Washington v. United States Dep't of Just.*, 846 F.3d
1235, 1240–41 (D.C. Cir. 2017); Sections 552(a)(1), 552(a)(2), and 552(a)(3) impose distinct
obligations using distinct verbs, scopes, and triggering mechanisms.

1 Because of that production has no defined endpoint. This is functionally equivalent to asking the Court
 2 to supervise a process where only one party knows the finish line. The Court should not permit a
 3 structure in which delay generates leverage. BOP's position across disputes that the court cannot
 4 evaluate compliance until BOP chooses to complete production. BOP's position is that adjudicating
 5 disputes should be deferred to summary judgment. Without a defined universe of records, summary
 6 judgment will occur in a factual vacuum and will likely require re-briefing after production. It is
 7 inefficient to litigate the merits of a case before knowing what evidence exists.

8 **Defendant's Statement:**

9 BOP believes it is inappropriate to brief arguments on discovery letter briefs in a Case
 10 Management Conference Statement. Plaintiff contends that "this case has no end in sight," but she
 11 ignores the whole point of this Conference. As set forth below, the parties have proposed schedules for
 12 the case below. BOP is eager for this case to end. If Plaintiff cooperates in narrowing the FOIA requests,
 13 as the parties discussed on March 20, 2026, the end can come sooner.

14 **4. Motions** There are no pending motions. The joint and separate proposed schedules are below.

15 **Joint Statement**

16 1. Summary Judgment Briefing

- 17 a. September 15, 2026 Plaintiff's Motion for Summary Judgment addressing allegations of:
 18 Failure to issue a compliant determination; Failure to comply with expedited processing
 19 requirements; Failure to provide estimated completion date; Timeliness violations;
 20 Jurisdictional bars to agency having more time under 5 U.S.C. § 552(a)(6)(C);
 21 b. October 15, 2026 Defendant's Opposition
 22 c. November 5, 2026 Plaintiff's Reply
 23 d. December 2026 Hearing

24 **Plaintiff's Statement:** BOP did not respond to Plaintiff's proposal that, by April 9, 2026, BOP must: 1.
 25 Complete all missed monthly productions, including October and November 2025, re-issue productions
 26 that were non-responsive or duplicative, including Releases 1, 9, 11, and Release 4, identify the total
 27 number of responsive records and the categories into which they fall, or explain why that information is
 28 not available, identify a date certain for completion of all remaining production, certify whether any
 responsive records remain unprocessed, and file declarations detailing pages reviewed, pages designated

1 non-responsive and the basis for those designations, systems and custodians searched, search terms and
2 date ranges used, records remaining outstanding, steps taken toward completion, and the anticipated
3 order of release in light of Plaintiff's stated priorities; 2. Affirm that a litigation hold is in effect, that no
4 responsive records have been destroyed, and that any applicable destruction schedules have been
5 suspended for the duration of the litigation.

6 On May 3, 2027, the parties will file cross-motions for summary judgment on all remaining
7 issues, including but not limited to (1) The Court's lack of jurisdiction to grant the agency additional
8 time to gather the universe of records and issue a determination (*see* 5 U.S.C. § 552(a)(6)(C)(i). (2)
9 Failure to comply with timing and expedition requirements. *See* 5 U.S.C. §§ 552(a)(3)(A) &
10 552(a)(6)(C)(i), 5 U.S.C. §552(a)(6)(E)(iii); *Edmonds v. FBI*, 417 F.3d 1319, 1323 (D.C. Cir. 2005). (3)
11 Failure to issue a final Determination Letter. *See* 5 U.S.C. § 552(a)(6)(A)(i); *Citizens for Responsibility*
12 *& Ethics in Wash (CREW) v. FEC*, 711 F.3d 180 (D.C. Cir. 2013). (4) Failure to provide "an estimated
13 date on which the agency will complete action on the request." 5 U.S.C. § 552(a)(7)(B)(ii). (5) Failure to
14 complete a search reasonably calculated to uncover all relevant documents. 5 U.S.C. §§ 552(a)(3)(A),
15 (a)(3)(C)-(D); *Zemansky v. EPA*, 767 F.2d 569 (9th Cir. 1985). (6) Improper withholding. 5 U.S.C. §
16 552(a)(4)(B); *DOJ v. Tax Analysts*, 492 U.S. 136, 151 n.12 (1989), with oppositions due June 2, 2027,
17 replies due June 23, 2027, and a hearing in July 2027. If necessary, targeted discovery will proceed from
18 September 10 through October 10, 2027, if the Court determines that material factual disputes remain
19 regarding determinations, search adequacy, or exemption methodology, followed by a pretrial
20 conference in September 2027 and a bench trial in October 2027. If further briefing is required,
21 supplemental summary judgment motions will be filed January 15, 2028, with oppositions due February
22 15, 2028, and replies due March 1, 2028.

23 **Defendants' Statement:**

24 BOP finds the first round of summary judgment briefing proposed by Plaintiff as acceptable.
25 However, while the parties had a productive meeting to begin narrowing Plaintiff's FOIA request in the
26 meeting on March 20, 2026, the parties will need to continue discussions to narrow the scope of the
27 FOIA request for BOP to know how much time will be required to finish making releases. BOP
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1 suggests that the Court order the parties to continue to meet and confer in good faith to narrow the FOIA
2 request, and then either by agreement or Court order there can be a decision about the time for BOP to
3 conclude finishing its release of documents in the September to December 2026 time frame since
4 Plaintiff proposed to brief that issue in her summary judgment motion. BOP suggests that Plaintiff's
5 Second Summary Judgment Briefing be scheduled once the time for BOP to conclude finishing its
6 release of documents has been decided by the parties or the Court. Plaintiff's proposal that BOP make
7 up Plaintiff's list of allegedly missed releases by April 9 prejudices a discovery letter brief that the
8 parties are filing.

9 **11. Relief**

10 **Plaintiff's Statement:** Plaintiff seeks targeted relief necessary for case management, the minimum
11 conditions required for the Court to evaluate compliance and move this case forward, including a
12 deadline for completion of BOP's search, identification of the universe of responsive records including
13 record counts by category, and disclosure of custodians, systems, and timeframes searched. The parties
14 are at an impasse on three related tracks, compliance with the Court's May 30, 2025, Production Order,
15 fulfillment of core FOIA obligations necessary to place the case in a posture suitable for motions
16 practice, and resolution of already ripe issues that would narrow the scope of dispute. Each of these
17 tracks turns on the same missing information, which remains exclusively within BOP's control. A case
18 management order addressing these threshold issues is therefore necessary not only to move the case
19 forward, but to establish a defined endpoint and preserve the functional value of the records for courts,
20 policymakers, journalists, and the individuals whose rights and futures depend on timely disclosure.

21 Plaintiff asks the court to order BOP, within thirty (30) days to issue a determination
22 encompassing a sworn declaration executed that shall describe in detail all steps taken to comply with
23 the Court's Order; identify the universe of responsive records located including number and type of
24 records, locations, custodial sources, and systems reviewed; search terms used; the total number of
25 pages processed; the number and type of records and pages remaining outstanding; the details of records
26 withheld and exemptions invoked, whether the search is complete, and the specific actions that remain
27 necessary to achieve full compliance. It shall state a date certain by which each outstanding monthly
28 production will be completed and a date certain by which all production will be completed. BOP shall

1 file sworn compliance reports every month that detail the number of pages reviewed during the reporting
2 period, the number of pages produced in full or in part, the number of pages withheld, the number of
3 pages designated non-responsive, the systems and custodians searched during that period, the steps
4 taken toward completion, and anticipated timelines for completion of prosecution and case resolution.
5 BOP’s declaration shall include: the steps taken to comply with the expedited processing determination
6 granted on July 10, 2024; The reasons for delay in issuing a determination; The measures, if any,
7 implemented to prioritize this request consistent with 5 U.S.C. § 552(a)(6)(E)(iii); exemptions it intends
8 to assert, and preclude assertion of new exemptions thereafter, absent good cause; Provide written
9 disclosure of the criteria used to label records “non-responsive”; Confirm no relevant records have been
10 destroyed since the request. The Court will conduct monthly compliance hearings in which a
11 responsible BOP official shall appear.

12 **Defendant’s Statement:**

13 Plaintiff is asking the Court to rule in her favor at a Case Management Conference on issues that
14 Plaintiff proposes for summary judgment briefing beginning in September. Plaintiff is overreaching, as
15 the parties should focus on continuing efforts to narrow the scope of the requests so that BOP can finish
16 releasing documents and the parties can resolve the case through summary judgment or resolution
17 through negotiation or ADR.

18 **12. Settlement and ADR** The parties are amenable to resolving the case through ADR or settlement.

19 DATED: April 3, 2026

Respectfully submitted,

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United States Attorney

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/s/ Caitlin Henry
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