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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

VICTORIA LAW,

Plaintiff,

v.

FEDERAL BUREAU OF PRISONS,

Defendant.

Case No. 3:24-CV-06628-AGT

STIPULATION AND [PROPOSED] ORDER CONTINUING DATE FOR FURTHER CASE MANAGEMENT CONFERENCE

Pursuant to Civil Local Rules 6-2 and 7-12, the parties to this action hereby stipulate and request that the Court continue the further case management conference, which is currently set for June 26, 2026 by videoconference. *See* ECF No. 79. The parties request that the further case management conference be continued to July 31, 2026 at 2:00 p.m., or as soon thereafter as the Court may be available, excepting August 7 and August 14, 2026. In further support of this stipulation, the parties report that they have complied with the Court's April 10, 2026 meet and confer order (ECF No. 78) and are working cooperatively in an attempt to resolve disputes and agree upon a case schedule without Court intervention. BOP shared email search terms and custodians for certain requests and reported the number of potentially

responsive "items" identified through one search. BOP has not provided the number of responsive pages associated with those results. For those "items," Plaintiff does not seek to add further search terms or custodians.

Plaintiff's Position: As part of the parties' ongoing meet-and-confer efforts, BOP agreed to provide Plaintiff with a proposed schedule by June 14. It did not. BOP has not completed its search, issued a determination, provided an accounting of the number of requests or pages that are fully completed and undisputed, the number that remain outstanding in whole or in part, or the total volume of responsive pages. The Court's order directs BOP to quantify responsive "pages" to meet its monthly 1,000 page mandate, not responsive "items."

BOP's Position: Defendant intended to provide a page count and a draft schedule to Plaintiff by June 14. However, on or about June 5, 2026, BOP learned of the issue referenced in the following paragraph. Defense counsel was on annual leave from June 5 to June 10, and immediately raised this issue with Plaintiff's counsel on June 12, as soon as he was reasonably able to do so after his return from leave. The referenced issue needs to be resolved before BOP can propose a case schedule to Plaintiff. BOP is attempting to coordinate with all interested individuals and resolve this issue amicably, as soon as possible.

The parties recently learned of an issue that requires input from individuals not participating in this stipulation that may affect the scope of records requiring review and production. *See* ECF No. 28 (instructing the parties to meet and confer and propose a case schedule by one week prior to the June 26, 2026 further case management conference). The parties thus respectfully request a one-month continuance to accommodate the schedules of the individuals involved and, if possible, for the issue to be resolved cooperatively in advance of the further case management conference with the Court.

IT IS SO STIPULATED.

DATED: June 17, 2026

Respectfully submitted,

CRAIG H. MISSAKIAN
United States Attorney

*/s/ Jevechius D. Bernardoni**
JEVECHIUS D. BERNARDONI
Assistant United States Attorney

Attorneys for Defendant

/s/ Caitlin Henry
CAITLIN HENRY

Attorney for Plaintiff

** In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty of perjury that all signatories have concurred in the filing of this document.*

[PROPOSED] ORDER

Pursuant to stipulation, IT IS SO ORDERED. The further case management conference is continued until July 31, 2026, at 2:00 p.m. by videoconference. The parties shall file a joint further case management conference statement no later than seven days prior to the further case management conference.

DATED:

THE HONORABLE ALEX G. TSE