CRAIG H. MISSAKIAN (CABN 125202)
United States Attorney
PAMELA T. JOHANN (CABN 145558)
Chief, Civil Division
JEVECHIUS D. BERNARDONI (CABN 281892)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7224
Facsimile: (415) 436-6748
jevechius.bernardoni@usdoj.gov

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. 3:24-CV-06628-AGT

STIPULATION AND [PROPOSED] ORDER TO CONTINUE JOINT CASE MANAGEMENT STATEMENT

WHEREAS, pursuant to Civil Local Rules 6-2 and 7-12, the parties to this action hereby stipulate and request that the Court continue the October 2, 2026 further case management conference to October 23, 2026;

WHEREAS, on September 4, 2026, the Court set a further case management conference for October 2, 2026 and instructed the parties to include a proposed case schedule in their joint case management statement (ECF No. 91);

WHEREAS, the parties have met and conferred and agree that, in order to facilitate the parties' case schedule negotiations, Defendant will provide Plaintiff with both (1) a page count of the remaining potentially responsive records that must be reviewed and processed and (2) a declaration establishing

Defendant's current FOIA processing resources (including Defendant's FOIA processing capacity and Defendant's competing FOIA processing obligations);

WHEREAS, as a result of competing demands on Defendant's limited resources, Defendant cannot provide Plaintiff with a page count for the universe of potentially responsive records prior to October 5, 2026 without violating the court-ordered processing rates both in this case and in other district court FOIA litigations; and

WHEREAS, the parties agree that their case schedule negotiations, and any subsequent discussions with the Court during a case management conference, would be more productive with the benefit of the page count and FOIA processing resource information that Defendant intends to provide to Plaintiff.

NOW, THEREFORE, the parties agree, subject to Court approval, that the case management conference currently set for October 2, 2026 should be continued to October 23, 2026.

DATED: September 24, 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 October 23, 2026, at 2:00 p.m. by videoconference. The parties shall file a Joint Case Management Statement by October 16, 2026. In their joint case management statement, the parties are directed to include a proposed case schedule. In the event they cannot agree on a proposed schedule, the parties must include briefing with authority addressing how the Court should evaluate the reasonableness of a proposed schedule in a FOIA case (given the procedural posture of this case).

DATED:

THE HONORABLE ALEX G. TSE