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1 – JOINT STATUS REPORT
Latif v. Holder, No. 3:10-cv-00750-BR

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON**

AYMAN LATIF, et al., <i>Plaintiffs,</i>	Case 3:10-cv-00750-BR
v. ERIC H. HOLDER, JR., et al., <i>Defendants.</i>	JOINT STATUS REPORT

Pursuant to this Court’s Order of August 28, 2013 (Docket Entry #110), the parties have met and conferred telephonically to discuss an appropriate means to provide the Court with additional information regarding the judicial review that is available to individuals who have been denied boarding on account of their alleged placement on the No Fly List. To supplement the record before the Court, the parties intend to submit a set of stipulated facts, followed by supplemental briefing. The parties jointly propose the following schedule, and respectfully request that the Court enter an order adopting it:

- Stipulated Facts – filed by September 27, 2013.
- Defendants’ Brief – filed by October 4, 2013.
- Plaintiffs’ Response Brief – filed by October 15, 2013.
- Defendants’ Reply Brief (if any) – filed by October 25, 2013.
- Plaintiffs’ Reply Brief (if any) – filed by November 8, 2013.

A proposed order reflecting these dates is attached.

The Court’s order also requires the parties to identify in this report “any additional issues that the parties believe need to be resolved on the existing Cross-Motions in light of the Court’s rulings herein.” (Docket Entry # 110 at 37–38.) The parties believe that the Court’s order has identified the issues presented by the existing cross-motions (*i.e.*, whether the plaintiffs have demonstrated that the defendants have violated their Fifth Amendment right to procedural due

process, and whether the plaintiffs have demonstrated that the defendants have violated the Administrative Procedure Act).

Dated: September 16, 2013.

/s/ Hina Shamsi

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Respectfully submitted,

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