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

_____)	
Make the Road New York, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 1:19-cv-02369-KBJ
)	
Kevin McAleenan, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

**JOINT STATEMENT CONCERNING THE COURT'S SEPTEMBER 6, 2019 MINUTE
ORDER**

The parties hereby submit the following joint statement in response to the Court's minute order issued following oral argument on September 6, 2019, requesting that "the parties shall submit a joint proposal regarding procedures for maintaining the status quo with respect to enforcement of the July 23rd Notice while the Plaintiffs' preliminary injunction is under review."

Defendants represent the following: Having met and conferred, and the Court having indicated at the September 6 hearing that it would require up to "three weeks" to issue a decision concerning the pending motion for preliminary injunction, and given the impossibility of ensuring compliance with the Court's proposal at the September 6 hearing that Defendants provide the Court and Plaintiffs the name of every individual subject to the July 23 Notice within 24 hours of their becoming subject to the Notice until the Court issues its written decision, Defendants will not begin implementing the July 23 Notice until September 27, 2019, three weeks (21 days) from September 6, 2019.

In light of Defendants' representation, the parties agree that no further action or procedures are necessary to facilitate the Court's issuance of a written decision at this time.

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Respectfully submitted,

JOSEPH H. HUNT
Assistant Attorney General

WILLIAM C. PEACHEY
Director

By: /s/ Erez Reuveni
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Dated: September 10, 2019

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Respectfully submitted,

/s/ Celso Perez

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**Pro hac vice application forthcoming*

*** Admitted pro hac vice*

****Filing pursuant to LCvR 83.2(c)*

*****Application for admission forthcoming*

CERTIFICATE OF SERVICE

I hereby certify that on September 10, 2019, I electronically filed the foregoing document with the Clerk of the Court for the United States Court District Court for the District of Columbia by using the CM/ECF system. Counsel in the case are registered CM/ECF users and service will be accomplished by the CM/ECF system.

By: /s/ Erez Reuveni
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