

# Ex. C

## Reuveni, Erez R. (CIV)

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**From:** Press, Joshua S. (CIV)  
**Sent:** Wednesday, August 08, 2018 10:01 AM  
**To:** Jennifer Chang Newell  
**Cc:** Darrow, Joseph A. (CIV); Reuveni, Erez R. (CIV); Cody Wofsy; Judy Rabinovitz; Katrina Eiland  
**Subject:** RE: Grace v. Sessions - L.R. 7(m)

Jennifer:

Good morning. Thank you for your patience; our clients can only agree to pause removal on the two plaintiffs you named yesterday until midnight tomorrow.

We also consent to not oppose the motions to seal declarations you mention below.

Best,

**Joshua S. Press | Trial Attorney**  
United States Department of Justice  
Civil Division – Office of Immigration Litigation  
District Court Section  
T: 202.305.0106 | F: 202.305.7000  
[joshua.press@usdoj.gov](mailto:joshua.press@usdoj.gov)

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**From:** Jennifer Chang Newell [mailto:jnewell@aclu.org]  
**Sent:** Tuesday, August 07, 2018 9:05 PM  
**To:** Press, Joshua S. (CIV) <jpress@CIV.USDOJ.GOV>  
**Cc:** Darrow, Joseph A. (CIV) <jdarrow@CIV.USDOJ.GOV>; Reuveni, Erez R. (CIV) <EReuveni@civ.usdoj.gov>; Cody Wofsy <cwofsy@aclu.org>; Judy Rabinovitz <JRabinovitz@aclu.org>; Katrina Eiland <keiland@aclu.org>  
**Subject:** Grace v. Sessions - L.R. 7(m)

Josh:

I am writing to meet and confer regarding our TRO/PI motion and certain accompanying motions. Per our prior discussion and email exchange yesterday, we are planning to file a motion to seal a plaintiff declaration for our named plaintiff, [REDACTED]. We also plan to file a motion to file the Doe plaintiff declarations under seal, in support of the TRO/PI request (the Court has already granted our motion to file the Doe plaintiff declarations under seal in support of our Motion for Pseudonym). Yesterday, you indicated that you do not oppose the motion to seal the plaintiff declaration for the named plaintiff. I assume you do not oppose our motion to file the Doe plaintiff declarations under seal in support of the TRO/PI request?

Thanks,  
Jennifer

**Jennifer Chang Newell**  
Pronouns: she, her, hers

Managing Attorney, California Office  
Immigrants' Rights Project  
American Civil Liberties Union  
39 Drumm Street, San Francisco, CA 94111  
415.343.0774 | [jnewell@aclu.org](mailto:jnewell@aclu.org)

aclu.org  



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**From:** Jennifer Chang Newell  
**Sent:** Tuesday, August 07, 2018 4:37 PM  
**To:** Press, Joshua S. (CIV) ([Joshua.Press@usdoj.gov](mailto:Joshua.Press@usdoj.gov))  
**Cc:** 'Darrow, Joseph A. (CIV)'; 'erez.r.reuveni@usdoj.gov'; Cody Wofsy; Judy Rabinovitz; Katrina Eiland  
**Subject:** Grace v. Sessions - PI schedule

Josh:

Thank you for speaking earlier. We had discussed what type of PI briefing schedule would be workable for the parties, in the event the government is willing to agree to a stay pending resolution of our PI request. The following schedule would be acceptable to us, if the government agrees to a stay pending resolution of the PI:

- Plaintiffs file PI motion tomorrow (8/8), by midnight (or, if any filing snafus occur, we would transmit the brief and exhibits to you via email, to ensure that you have the motion pleadings before midnight).
- Defendants' Opposition to PI due 8/22.
- Plaintiffs' reply due 8/29.

Please let us know your position as early as you can tomorrow morning, no later than 9am Eastern. If the government is not able to agree to a stay pending a PI, then we will have to go to the Court with our TRO request.

Thank you.  
Jennifer

**Jennifer Chang Newell**

Pronouns: she, her, hers

Managing Attorney, California Office  
Immigrants' Rights Project  
American Civil Liberties Union  
39 Drumm Street, San Francisco, CA 94111  
415.343.0774 | [jnewell@aclu.org](mailto:jnewell@aclu.org)

aclu.org  



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