



program operated. Plaintiffs will provide Defendants with up to 1,000 names, along with Department of Homeland Security Form G-639 releases, for individuals who received credible fear interviews at those locations during the relevant period. Defendants will provide confirmation as to whether the individuals were interviewed by U.S. Border Patrol agents. Plaintiffs agreed to provide the names within six months of execution of the agreement, or by August 16, 2023.

3. On February 17, 2023, pursuant to the agreement, Defendant USCIS provided Plaintiffs with information about the dates and locations of the USCIS credible fear pilot program. That information was further clarified on February 24, 2023.

4. The sole matter in dispute is the documents before the Court for *in camera* review. The parties also need to address whether settlement on attorney fees can be reached.

5. In light of the above, the parties respectfully request that they be permitted to submit another joint status report on or before April 28, 2023, to inform the Court of the progress of the agreement finalization. Should any issues requiring the Court's intervention arise before then, the Parties will file an Interim Status Report.

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Date: February 28, 2023,

Respectfully Submitted,

/s/ Emma Winger

EMMA WINGER\*

American Immigration Council

\*\*1331 G Street NW, Suite 200

Washington, DC 20005

Telephone: (202) 507-7512

[ewinger@immcouncil.org](mailto:ewinger@immcouncil.org)

/s/ Claudia Valenzuela

CLAUDIA VALENZUELA

D.C. Bar #IL0056

IMMIGRANT LEGAL DEFENSE

1322 Webster Street

Suite 300

Oakland, CA 94612

Telephone: (510) 519-1231

[cvalenzuela@immcouncil.org](mailto:cvalenzuela@immcouncil.org)

\* Admitted pro hac vice

\*\* Not admitted to D.C. Practice limited  
to federal courts

*Counsel for Plaintiffs*

MATTHEW M. GRAVES

D.C. Bar No. 481052

United States Attorney

BRIAN P. HUDAK

Chief, Civil Division

By: /s/ T Anthony Quinn

T. ANTHONY QUINN

D.C. Bar No. 415213

Assistant United States Attorney

601 D Street, N.W.

Washington, D.C. 20530

(202) 252-7558

[Tony.Quinn2@usdoj.gov](mailto:Tony.Quinn2@usdoj.gov)

*Counsel for Defendants*