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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 S.A.; J.A.; A.B.; R.C., on behalf of himself and
as Guardian Ad Litem for J.C., a minor child;
14 M.C.; D.D.; G.E., on behalf of himself and as
Guardian Ad Litem for B.E., a minor child; J.F.
15 on behalf of himself and as Guardian Ad Litem
for H.F. and A.F., minor children, on behalf of
16 themselves and on behalf of a class of all
similarly situated individuals, and CASA,

17 Plaintiffs,

18 v.

19 DONALD J. TRUMP, in his official capacity as
20 President of the United States; U.S.
DEPARTMENT OF HOMELAND
21 SECURITY; U.S. CITIZENSHIP AND
IMMIGRATION SERVICES; U.S.
22 DEPARTMENT OF STATE; KIRSTJEN
NIELSEN, in her official capacity as Secretary
23 of Homeland Security; MICHAEL R.
POMPEO, in his official capacity as Secretary
24 of State; L. FRANCIS CISSNA, in his official
capacity as Director of U.S. Citizenship and
25 Immigration Services; UNITED STATES OF
AMERICA,

26 Defendants.
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Case No. 18-CV-03539 LB

~~[PROPOSED]~~ STIPULATED FINAL
JUDGMENT AND ORDER FOR PERMANENT
INJUNCTION

1 Pursuant to the Parties' Binding Memorandum of Agreement ("Agreement") (ECF 90), which
2 was subsequently adopted as an Order by this Court (ECF 91), the Parties respectfully request that the
3 Court enter the attached Stipulated Final Judgment and Order for Permanent Injunction, as contemplated
4 by the Agreement.

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6 DATED: May 16, 2019

Respectfully submitted,

7 DAVID L. ANDERSON
8 United States Attorney

9 /s/ Wendy M. Garbers
10 WENDY M. GARBERS
11 Assistant United States Attorney

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28 Attorneys for the Federal Defendants

1 DATED: May 16, 2019

/s/ Linda Evarts*

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***Pro Hac Vice* motion forthcoming

Attorneys for Plaintiffs

*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]~~ STIPULATED FINAL JUDGMENT AND ORDER FOR PERMANENT INJUNCTION

Pursuant to the Parties' Binding Memorandum of Agreement ("Agreement") (ECF 90 at 3), which was subsequently adopted as an Order by this Court (ECF 91), IT IS ORDERED AND ADJUDGED that the Court's Order granting in part and denying in part Plaintiffs' motion for preliminary injunction (ECF 77) shall become the Court's final injunction, as follows:

1. The Department of Homeland Security's ("DHS's") decision to mass-rescind conditional approvals for the approximately 2,700 beneficiaries conditionally approved for parole but who had not traveled to the United States is vacated.
2. DHS must continue the post-conditional-approval processing for the approximately 2,700 beneficiaries under the policies, guidance, and practices for processing beneficiaries that it had in place before January 2017, including the procedures described in USCIS's publication *Central American Minors (CAM) Parole Program: Information for Conditionally Approved Applicants* (Exhibit 48 in the administrative record), and as further explicated in USCIS's CAM Parole Project Plan (ECF 93-1). DHS is enjoined from adopting any policy, procedure, or practice to not process the approximately 2,700 beneficiaries or to place their processing on hold en masse. Nothing in this order prevents DHS from placing any beneficiary's processing on hold on an individualized basis to the extent that it would do so under the policies and procedures it had in place before January 2017.
3. Nothing in this order compels DHS to reach any particular outcome with respect to the processing of any individual beneficiary or prevents DHS from exercising its discretion with respect to the parole of any individual beneficiary. This Order does require DHS to process the approximately 2,700 beneficiaries in good faith pursuant to the policies, guidance, and practices it had in place prior to January 2017.

IT IS FURTHER ORDERED that, as set forth in the Parties' Agreement (ECF 90 at 3, 6), the Court will have continuing jurisdiction to enforce this Injunction and the Parties' Agreement.

1 IT IS FURTHER ORDERED that, as set forth in the Parties' Agreement (ECF 90 at 3), each
2 party shall bear his/her/its own attorneys' fees and costs.

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4 Dated: May 17, 2019

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7 HONORABLE LAUREL BEELER
United States Magistrate Judge