

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

CITY OF PROVIDENCE and)	
CITY OF CENTRAL FALLS,)	
)	
Plaintiffs,)	
)	Civil Action No.
-v.-)	CA-18-437-JJM-LDA
)	
JEFFERSON B. SESSIONS III, in his)	
Official capacity as Attorney General of the)	
United States, and the UNITED STATES)	
DEPARTMENT OF JUSTICE,)	
)	
Defendants.)	
)	

STIPULATION AND PROPOSED ORDER EXTENDING DEFENDANTS’ TIME TO RESPOND TO THE COMPLAINT, AND ESTABLISHING BRIEFING SCHEDULE

Plaintiffs, the City of Providence and the City of Central Falls (the “Plaintiff Municipalities”), and Defendants, the United States Department of Justice and Jefferson B. Sessions III (“Defendants”), do HEREBY STIPULATE AND AGREE as follows:

1. Defendants’ time to answer or otherwise respond to the complaint is extended and held in abeyance pending resolution of dispositive motions made pursuant to the briefing schedule set forth below.
2. The Plaintiff Municipalities (or either of them) will file an amended complaint on or before November 10, 2018.
3. Thereafter, having conferred, the parties are of the view that the issues raised in this litigation can be resolved by the Court on motion. Accordingly, they agree and propose the following briefing schedule, subsequent to the filing of the amended complaint:

- a. On or before November 30, 2018, Defendants will file a certified administrative record pertaining to the Plaintiff Municipalities' claims under the Administrative Procedure Act, 5 U.S.C. § 706;
- b. On or before December 21, 2018, the Plaintiff Municipalities shall file a Motion for Summary Judgment.
- c. On or before January 31, 2019, Defendants shall file their Opposition to Plaintiff Municipalities' Motion for Summary Judgment, and any Motion to Dismiss, or, in the alternative, Motion for Summary Judgment.
- d. On or before March 1, 2019, the Plaintiff Municipalities shall file their Opposition to Defendants' motion(s), and a Reply, if any, in further support of their Motion for Summary Judgment.
- e. On or before April 1, 2019, Defendants shall file any Reply in support of their motions.

DATED: October 12, 2018

Respectfully submitted,

STEPHEN G. DAMBRUCH
United States Attorney

/s/ Jeffrey Dana
JEFFREY DANA (Bar No. 5580)
City Solicitor, City of Providence
Solicitor's Office
444 Westminster Street, Suite 220
Providence, RI 02903
Tel.: (401) 680-5333
Fax: (401) 680-5520
Email: jdana@providenceri.gov

/s/ Zachary A. Cunha
ZACHARY A. CUNHA (Bar No. 7855)
Assistant United States Attorney
50 Kennedy Plaza, 8th Floor
Providence, RI 02903
Tel.: (401) 709-5000
Fax: (401) 709-5001
Email: Zachary.Cunha@usdoj.gov

Counsel for Defendants

/s/ Matthew Jerzyk

MATTHEW JERZYK (Bar No. 7945)
City Solicitor, City of Central Falls
580 Broad Street
Central Falls, RI 02863
Tel.: (401) 616-2435
Fax: (401) 727-7422
Email: mjerzyk@centralfallsri.us

Counsel for Plaintiffs

SO ORDERED:

OCTOBER __, 2018

HON. JOHN J. McCONNELL, Jr.
UNITED STATES DISTRICT JUDGE