

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

DOC SOCIETY, INTERNATIONAL
DOCUMENTARY ASSOCIATION,

Plaintiffs,

v.

MICHAEL R. POMPEO, in his official
capacity as Secretary of State, CHAD. F.
WOLF, in his official capacity as Acting
Secretary of Homeland Security,

Defendants.

Civil Action No. 19-cv-3632 (TJK)

JOINT REQUEST FOR ENTRY OF A STIPULATED BRIEFING SCHEDULE

Plaintiffs Doc Society and International Documentary Association commenced the above-captioned action challenging a Department of State requirement that applicants for U.S. visas register their social media identifiers with the U.S. Government (the “Registration Requirement”). Compl., ECF No. 1. The lawsuit names as Defendants Michael R. Pompeo, in his official capacity as Secretary of State, and Chad F. Wolf, in his official capacity as Acting Secretary of Homeland Security. The Plaintiffs allege, among other things, that the Registration Requirement violates the Administrative Procedure Act, exceeds the Secretary of State’s authority under the Immigration and Nationality Act, and violates the First Amendment to the United States Constitution. *See id.*, Counts I-II.

Defendants’ response to Plaintiffs’ Complaint is currently due on February 10, 2020. Defendants anticipate responding to Plaintiffs’ Complaint by filing a motion to dismiss, and Plaintiffs expressly reserve all rights to challenge Defendants’ arguments for dismissal. Undersigned Defense counsel represents that it has a number of conflicts in February, including a

scheduled mediation and summary judgment motion due within approximately a week of the current February 10th deadline. The parties have conferred about a briefing schedule, which includes a proposed deadline for amici curiae to file briefs, if permitted by this Court. Accordingly, the parties respectfully request entry of the following schedule, which they submit will promote the orderly and efficient resolution of Defendants' anticipated motion to dismiss and Plaintiffs' opposition thereto:

- Defendants' response to Plaintiffs' Complaint, which Defendants have indicated will be a Motion to Dismiss, shall be filed no later than March 2, 2020;
- Plaintiffs' Opposition to Defendants' Motion to Dismiss shall be filed no later than April 2, 2020;
- Amicus briefs shall be filed no later than April 3, 2020;
- Defendants' Reply in support of their Motion to Dismiss shall be filed no later than April 17, 2020.

A proposed order is attached herewith.

Dated: January 29, 2020

Respectfully submitted,

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