

1 Erwin Chemerinsky (*pro hac vice*)  
echemerinsky@law.berkeley.edu  
2 Claudia Polsky (CA Bar No. 185505)  
cpolsky@law.berkeley.edu  
3 U.C. BERKELEY SCHOOL OF LAW  
Law Building  
Berkeley, CA 94720-7200  
4 Telephone: 510.642.6483

5 Elizabeth J. Cabraser (CA Bar No. 83151)  
ecabraser@lchb.com  
6 Richard M. Heimann (CA Bar No. 63607)  
rheimann@lchb.com  
7 Kevin R. Budner (CA Bar No. 287271)  
kbudner@lchb.com  
8 LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP  
9 275 Battery Street, 29th Floor  
San Francisco, CA 94111  
10 Telephone: 415.956.1000

11 Anthony P. Schoenberg (CA Bar No. 203714)  
tschoenberg@fbm.com  
12 FARELLA BRAUN + MARTEL LLP  
One Bush Street, Suite 900  
13 San Francisco, CA 94104  
14 Telephone: 415. 954.4400

15 *Attorneys for Plaintiffs and the Proposed Class*  
[Additional counsel listed on signature page]

17 **UNITED STATES DISTRICT COURT**  
18 **NORTHERN DISTRICT OF CALIFORNIA**  
19 **SAN FRANCISCO DIVISION**

20 NEETA THAKUR, *et al.*,

21 Plaintiffs,

22 v.

23 DONALD J. TRUMP, in his official capacity as )  
24 President of the United States, *et al.*, )

25 Defendants. )  
26 )  
27 )

) Case No. 25-cv-4737-RFL

) **[PROPOSED] ORDER GRANTING**  
) **ADMINISTRATIVE MOTION FOR AN**  
) **EXTENSION**

) Judge: Hon. Rita F. Lin

1 Having considered the Parties' motion the Court **GRANTS** the motion for good cause shown.

2 The Court hereby **ORDERS** that the discovery period in this matter be extended by two weeks,  
3 until May 22, 2026, to permit further negotiations between the Parties on finalizing a set of stipulations  
4 and settlement terms, as set forth in the Parties' joint statement and motion.

5 The Court further **ORDERS** that the deadline to coordinate with the Parties in *State of*  
6 *California v. Wright* be extended by one week, until May 29, 2026. *See* ECF No. 194.

7  
8  
9 IT IS SO ORDERED

10  
11 DATED: \_\_\_\_\_

\_\_\_\_\_   
The Honorable Rita F. Lin  
United States District Court Judge