

1 JEFFREY BOSSERT CLARK  
 Acting Assistant Attorney General  
 2 DAVID ANDERSON  
 United States Attorney  
 3 BRAD P. ROSENBERG  
 Assistant Branch Director  
 4 GALEN N. THORP (VA Bar #75517)  
 Senior Trial Counsel  
 5 STEPHEN M. PEZZI (DC Bar #995500)  
 Trial Attorney  
 6 United States Department of Justice  
 Civil Division, Federal Programs Branch  
 7 1100 L Street, N.W.  
 Washington, DC 20005  
 Telephone: (202) 514-4781  
 8 Facsimile: (202) 616-8470  
 9 E-mail: galen.thorp@usdoj.gov  
 10  
 11

12 *Attorneys for Defendants*

13  
 14 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
 15 **SAN FRANCISCO DIVISION**

16 THE REGENTS OF THE UNIVERSITY OF  
 17 CALIFORNIA and JANET NAPOLITANO,  
 in her official capacity as President of the  
 18 University of California,

19 Plaintiffs,

20 v.

21 U.S. DEPARTMENT OF HOMELAND  
 SECURITY and CHAD F. WOLF, in his  
 22 official capacity as Acting Secretary of  
 Homeland Security,

23 Defendants.

CASE NO. 17-CV-05211-WHA  
 CASE NO. 17-CV-05325-WHA  
 CASE NO. 17-CV-05329-WHA  
 CASE NO. 17-CV-05380-WHA  
 CASE NO. 17-CV-05813-WHA

**NOTICE**

1 Pursuant to the parties' agreement in their Joint Case-Management Statement, Oct. 15,  
2 2020, ECF No. 309, Defendants in the above-captioned matters hereby file the Administrative  
3 Record for the memorandum issued by Acting Secretary Chad F. Wolf on July 28, 2020, entitled  
4 "Reconsideration of the June 15, 2012 Memorandum Entitled 'Exercising Prosecutorial Discretion  
5 with Respect to Individuals Who Came to the United States as Children.'" Without conceding that  
6 privileged documents are properly part of an administrative record, Defendants also file a privilege  
7 log for the privileged documents that were directly or indirectly considered by Acting Secretary  
8 Wolf in connection with his July 28, 2020 decision.

9  
10 Dated: November 9, 2020

Respectfully submitted,

11 JEFFREY BOSSERT CLARK  
12 Acting Assistant Attorney General

13 DAVID ANDERSON  
14 United States Attorney

15 BRAD P. ROSENBERG  
16 Assistant Branch Director

17 */s/ Galen N. Thorp*  
18 GALEN N. THORP (VA Bar #75517)  
19 Senior Trial Counsel  
20 STEPHEN M. PEZZI (DC Bar #995500)  
21 Trial Attorney  
22 United States Department of Justice  
23 Civil Division, Federal Programs Branch  
24 1100 L Street, N.W.  
25 Washington, DC 20005  
26 Phone: (202) 514-4781  
27 Fax: (202) 616-8470  
28 Email: galen.thorp@usdoj.gov

*Attorneys for Defendants*