

## Appendix: Court Actions Across the Country to Reduce Incarceration in Light of Covid-19<sup>1</sup>

| State      | Judicial Body  | Forum                                   | Nature of Relief   |
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| Alabama    | Circuit Court for the 19 <sup>th</sup> Judicial Circuit of Alabama                       | Administrative order                    | <ul style="list-style-type: none"> <li>Judge Fuller ordered “all inmates currently held on appearance bonds of \$5,000.00 or less be immediately released on recognizance with instructions to personally appear at their next schedule court appearance.”<sup>2</sup></li> </ul>  |
| Arizona    | Coconino County court system and jail, Judge Dan Slayton, along with other county judges | Court order                             | <ul style="list-style-type: none"> <li>As of March 20, 2020, Judge Dan Slayton and other county judges have released around 50 people who were held in the county jail on non-violent charges.<sup>3</sup></li> </ul>  |
| California | Supreme Court of California, Chief Justice Tani Cantil-Sakauye                           | Advisory                                | <ul style="list-style-type: none"> <li>The Chief Justice issued guidance encouraging the state’s superior courts to, among other things:               <ul style="list-style-type: none"> <li>“Lower bail amounts significantly for the duration of the coronavirus emergency, including lowering the bail amount to \$0 for many lower level offenses.”</li> <li>“Consider a defendant's existing health conditions, and conditions existing at the anticipated place of confinement, in setting conditions of custody for adult or juvenile defendants.”</li> <li>“Identify detainees with less than 60 days in custody to permit early release, with or without supervision or community-based treatment.”<sup>4</sup></li> </ul> </li> </ul> |
|            | Sacramento Superior Court, Judge Hom   | Order                                   | <ul style="list-style-type: none"> <li>The Court entered a standing order authorizing their sheriff to release those within 30 days of release, regardless of crime.<sup>5</sup></li> </ul>  |
| Kentucky   | Kentucky, Chief Justice John Minton Jr.  | Letter to state judges and court clerks | <ul style="list-style-type: none"> <li>Kentucky, Chief Justice John Minton Jr. told state’s judges and court clerks to release jail inmates “as quickly as we can” noting, “jails are susceptible to worse-case scenarios due to the close proximity of people and the number of pre-existing conditions,” and that courts have the responsibility “to work with jailers and other county officials to safely release as many defendants as we can as quickly as we can.”<sup>6</sup></li> </ul>   |

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| <b>Maine</b>      | State of Maine<br>Superior Court,<br>Chief Justice<br>Mullen and District<br>Court Chief Judge<br>Sparaco and<br>Deputy Chief Judge<br>French | Emergency<br>Order                                      | <ul style="list-style-type: none"> <li>The Superior Court and District Court ordered all trial courts to immediately vacate all outstanding warrants for unpaid fines, restitution, fees, and failures to appear.<sup>7</sup></li> </ul>  |
| <b>Michigan</b>   | Chief Justice<br>Bridget M.<br>McCormack,<br>Michigan Supreme<br>Court  | Joint Statement   | <ul style="list-style-type: none"> <li>In a Joint statement, Chief Justice McCormack urged judges to “use the statutory authority they have to reduce and suspend jail sentences for people who do not pose a public safety risk[,]... release far more people on their own recognizance while they await their day in court...[a]nd judges should use probation and treatment programs as jail alternatives.”<sup>8</sup></li> </ul> |
| <b>Montana</b>    | Supreme Court of<br>Montana, Chief<br>Justice McGrath   | Letter to<br>Judges                                     | <ul style="list-style-type: none"> <li>Chief Justice of the Montana Supreme Court urged judges to “review your jail rosters and release, without bond, as many prisoners as you are able, especially those being held for non-violent offenses.”<sup>9</sup></li> </ul>   |
| <b>New Jersey</b> | New Jersey<br>Supreme Court,<br>Chief Justice<br>Rabner   | Consent Order   | <ul style="list-style-type: none"> <li>In New Jersey, after the Supreme Court ordered briefing and argument on why it should not order the immediate release of individuals serving county jail sentences, the Attorney General and County Prosecutors agreed to create an immediate presumption of release for every person serving a county jail sentence in New Jersey.<sup>10</sup></li> </ul>                                    |
| <b>New York</b>   | New York State<br>Supreme Court,<br>Bronx County,<br>Justice Doris M.<br>Gonzales   | Judicial ruling<br>based on writ<br>of habeas<br>corpus | <ul style="list-style-type: none"> <li>In a habeas petition brought by the Legal Aid Society, a Justice Doris M. Gonzales ordered the release of 106 individuals currently held at Rikers Island on a non-criminal technical parole violation. These individuals were selected in the petition by virtue of their age and/or underlying medical condition.<sup>11</sup></li> </ul>  |
|                   | New York Supreme<br>Court Justice Mark<br>Dwyer   | Judicial ruling<br>based on writ<br>of habeas<br>corpus | <ul style="list-style-type: none"> <li>In a habeas petition brought by the Legal Aid Society, a Justice Mark Dwyer ordered the release of 16 individuals currently held at Rikers Island on pretrial detention or parole violation. These individuals were selected in the petition by virtue of their age and/or underlying medical condition.<sup>12</sup></li> </ul>   |

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| <b>Ohio</b>           | Ohio Supreme Court, Chief Justice Maureen O'Connor                  | News Conference         | <ul style="list-style-type: none"> <li>Chief Justice O'Connor urged "judges to use their discretion and release people held in jail and incarcerated individuals who are in a high-risk category for being infected with the virus."<sup>13</sup></li> </ul>   |
| <b>South Carolina</b> | Supreme Court of South Carolina, Chief Justice Beatty               | Memorandum              | <ul style="list-style-type: none"> <li>The Chief Justice instructed that "any person charged with a non-capital crime shall be ordered released pending trial on his own recognizance without surety, unless an unreasonable danger to the community will result or the accused is an extreme flight risk."<sup>14</sup></li> </ul>  |
| <b>Texas</b>          | Travis County, Texas, Judges  | Individual Court Orders | <ul style="list-style-type: none"> <li>Travis County has begun releasing some defendants in custody with underlying health conditions, to reduce the potential spread of COVID-19 in the county's jails. After Austin saw its first positive cases of COVID-19, judges in the county nearly doubled its release of people from local jails on personal bonds, with one judge alone reversing four bond decisions after "balancing this pandemic and public health safety of inmates against what they're charged with."<sup>15</sup></li> </ul>  |
| <b>Utah</b>           | Utah Supreme Court and Utah Judicial Council, Chief Justice Durrant | Administrative Order    | <ul style="list-style-type: none"> <li>The Chief Justice of the Utah Supreme Court ordered that for defendants in-custody on certain misdemeanor offenses, "the assigned judge must reconsider the defendant's custody status and is encouraged to release the defendant subject to appropriate conditions."<sup>16</sup></li> </ul>   |
| <b>Washington</b>     | Washington Supreme Court, Chief Justice Stephens                    | Order                   | <ul style="list-style-type: none"> <li>Chief Justice Stephens ordered judges not to issue bench warrants for failure to appear, "unless necessary for the immediate preservation of public or individual safety" and "to hear motions for pretrial release on an expediated basis without requiring a motion to shorten time." Additionally, for populations designated as at-risk or vulnerable by the Centers for Disease Control, the COVID-19 crisis is presumed to be a material change in circumstances to permit amendment of a previous bail order or to modify conditions of pre-trial release.<sup>17</sup></li> </ul> |
| <b>Wyoming</b>        | Wyoming Supreme Court, Chief Justice Davis                          | Order                   | <ul style="list-style-type: none"> <li>The Chief Justice instructed judges to issue summonses instead of bench warrants, unless public safety compels otherwise.<sup>18</sup></li> </ul>   |

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| <b>Federal Criminal Detention</b> | C.D. Cal, Judge James V. Selna | Minute Order       | <ul style="list-style-type: none"> <li>The Court granted temporary release for 90 days, pursuant to 18 U.S.C. § 3142 (i), which authorizes discretionary temporary release when necessary for a person’s defense or another compelling reason. Judge Selna held the defendant’s age and medical conditions, which place him in the population most susceptible to COVID-19, and in light of the pandemic, to constitute “another compelling reason” and granted his temporary release.<sup>19</sup></li> </ul> |
|                                   | D. Ct., Judge Jeffrey A. Meyer | Order              | <ul style="list-style-type: none"> <li>Judge Meyer ordered the release of defendant stating that “the conditions of confinement at Wyatt are not compatible” with current COVID-19 public health guidance concerning social distancing and avoiding congregating in large groups. Judge Meyer is one of four federal judges in Connecticut who has released inmates in connection with the COVID-19 pandemic.<sup>20</sup></li> </ul>  |
|                                   | D.D.C., Judge Randolph D. Moss | Minute Order       | <ul style="list-style-type: none"> <li>Judge Moss released defendant, despite acknowledging offense charged—marijuana distribution and felon in possession—“is serious” because among other factors mitigating public safety concerns “incarcerating the defendant while the current COVID-19 crisis continues to expand poses a greater risk to community safety than posed by Defendant’s release to home confinement.”<sup>21</sup></li> </ul>  |
|                                   | D.D.C., Judge Randolph D. Moss | Memorandum Opinion | <ul style="list-style-type: none"> <li>Judge Moss released defendant while awaiting trial after weighing the risk to the public of releasing defendant [charged with distribution of child pornography] directly against risk to community safety if defendant remained incarcerated in light of the COVID-19 pandemic.<sup>22</sup></li> </ul>  |

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|  | D. Nev., Judge Jones            | Opinion and Order | <ul style="list-style-type: none"> <li>Judge Jones delayed defendant's date to surrender to begin his intermittent confinement by a minimum of 30 days because "[i]n considering the total harm and benefits to prisoner and society . . . temporarily suspending [defendant's] intermittent confinement would appear to satisfy the interests of everyone during this rapidly encroaching pandemic." In coming to this conclusion, the court placed weight on the fact that "incarcerated individuals are at special risk of infection, given their living situations, and may also be less able to participate in proactive measures to keep themselves safe; because infection control is challenging in these settings."<sup>23</sup></li> </ul> |
|  | D. S.C., Judge David C. Norton  | Order             | <ul style="list-style-type: none"> <li>Judge Norton granted compassionate release for 73-year-old with severe health conditions under the First Step Act, "[g]iven defendant's tenuous health condition and age, remaining incarcerated during the current global pandemic puts him at even higher risk for severe illness and possible death, and Congress has expressed its desire for courts to [release federal inmates who are vulnerable to COVID-19]."<sup>24</sup></li> </ul>  |
|  | N.D. Cal., Judge Vince Chhabria | Sua Sponte Order  | <ul style="list-style-type: none"> <li>Judge Chhabria issued a sua sponte decision extending defendant's surrender date from June 12, 2020 to September 1, 2020 stating: "By now it almost goes without saying that we should not be adding to the prison population during the COVID-19 pandemic if it can be avoided . . . To avoid adding to the chaos and creating unnecessary health risks, offenders who are on release and scheduled to surrender to the Bureau of Prisons in the coming months should, absent truly extraordinary circumstances, have their surrender dates extended until this public health crisis has passed."<sup>25</sup></li> </ul>  |
|  | N.D. Cal., Judge Hixson         | Order             | <ul style="list-style-type: none"> <li>Judge Hixson released a 74-year old in light of COVID-19 holding "[t]he risk that this vulnerable person will contract COVID-19 while in jail is a special circumstance that warrants bail. Release under the current circumstances also serves the United States' treaty obligation to Peru, which - if there is probable cause to believe Toledo committed the alleged crimes - is to deliver him to Peru alive."<sup>26</sup></li> </ul>   |

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|                                      | S.D.N.Y., Judge Paul A. Engelmayer   | Amended Order  | <ul style="list-style-type: none"> <li>Judge Engelmayer granted defendant temporary release from custody, pursuant to 18 U.S.C. § 3142(i), “based on the unique confluence of serious health issues and other risk factors facing this defendant, including but not limited to the defendant’s serious progressive lung disease and other significant health issues, which place him at a substantially heightened risk of dangerous complications should he contract COVID-19 as compared to most other individuals.”<sup>27</sup></li> </ul>  |
|                                      | S.D.N.Y., Judge Alison J. Nathan   | Opinion & Order  | <ul style="list-style-type: none"> <li>Judge Nathan ordered the Defendant released subject to the additional conditions of 24-hour home incarceration and electronic location monitoring as directed by the Probation Department based in part on “the unprecedented and extraordinarily dangerous nature of the COVID-19 pandemic” which may place “at a heightened risk of contracting COVID-19 should an outbreak develop [in a prison].”<sup>28</sup></li> </ul>  |
| <b>Federal Immigration Detention</b> | 9th Cir., Judges Wardlaw, M. Smith, and Judge Siler, 6 <sup>th</sup> Cir., sitting by designation. | Sua Sponte Order   | <ul style="list-style-type: none"> <li>The panel held “[i]n light of the rapidly escalating public health crisis, which public health authorities predict will especially impact immigration detention centers, the court <i>sua sponte</i> orders that Petitioner be immediately released from detention and that removal of Petitioner be stayed pending final disposition by this court.”<sup>29</sup></li> </ul>  |
|                                      | C.D. Cal, Judge Terry J. Halter, Jr.   | TRO and order to show cause based on writ of habeas corpus | <ul style="list-style-type: none"> <li>Judge Halter ordered the release of two ICE detainees. The court found that in detention “[p]etitioners have not been protected [against risks associated with COVID-19]. They are not kept at least 6 feet apart from others at all times. They have been put into a situation where they are forced to touch surfaces touched by other detainees, such as with common sinks, toilets and showers. Moreover, the Government cannot deny the fact that the risk of infection in immigration detention facilities – and jails – is particularly high if an asymptomatic guard, or other employee, enters a facility. While social visits have been discontinued at Adelanto, the rotation of guards and other staff continues.”<sup>30</sup></li> </ul> |
|                                      | D. Mass, Judge Mark L. Wolf  | Oral Order   | <ul style="list-style-type: none"> <li>Judge Wolf ordered the release, with conditions, from ICE custody a member of the class in <i>Calderon v. Nielsen</i> based, in part, on the “extraordinary circumstances” posed by COVID-19.<sup>31</sup></li> </ul>  |

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|  | S.D.N.Y., Judge George B. Daniels | Memorandum Decision and Order  | <ul style="list-style-type: none"> <li>Judge Daniels ordered the release, under <i>Mapp v. Reno</i>, 241 F.3d 221 (2d Cir. 2001), of an individual as there was likelihood of success on the merits and COVID-19 risks and individual's own medical issues constituted "extraordinary circumstances warranting release."<sup>32</sup></li> </ul>  |
|  | S.D.N.Y., Judge Alison J. Nathan  | Opinion and Order              | <ul style="list-style-type: none"> <li>Judge Nathan ordered the immediate release of four detainees finding "no evidence that the government took any specific action to prevent the spread of COVID-19 to high-risk individuals . . . held in civil detention."<sup>33</sup></li> </ul>  |
|  | S.D.N.Y., Judge Analisa Torres    | Memorandum Decision and Order. | <ul style="list-style-type: none"> <li>Judge Torres granted immediate release on recognizance for ten individuals in immigration detention who have a variety of chronic health conditions that put them at high risk for COVID-19. These conditions include obesity, asthma, diabetes, pulmonary disease, history of congestive heart failure, respiratory problems, gastrointestinal problems, and colorectal bleeding. The court held detainees face serious risks to their health in confinement and "if they remain in immigration detention constitutes irreparable harm warranting a TRO."<sup>34</sup></li> </ul> |

<sup>1</sup> This chart provides only a sample of the judicial action taken throughout the country as judges continue to respond to the COVID-19 pandemic.

<sup>2</sup> Administrative Order, No. 2020-00010, Ala. Ct. App. (Mar. 18, 2020), <https://drive.google.com/file/d/1I4QLwsytSVkdOuo5p6qb1JcuFWcAV4oA/view?usp=sharing>. Note: the original order has been revised to provide discretion to the Sheriffs. See Mike Carson, *Alabama Judge Orders Jail Inmates Released, then Leaves it Up to Sheriffs*, AL.Com (Mar. 19, 2020), <https://www.al.com/news/2020/03/alabama-judge-orders-jail-inmates-released-then-leaves-it-up-to-sheriffs.html>.

<sup>3</sup> Scott Buffon, *Coconino County Jail Releases Nonviolent Inmates in Light of Coronavirus Concerns*, Arizona Daily Sun (updated Mar. 25, 2020), [https://azdailysun.com/news/local/coconino-county-jail-releases-nonviolent-inmates-in-light-of-coronavirus/article\\_a6046904-18ff-532a-9dba-54a58862c50b.html](https://azdailysun.com/news/local/coconino-county-jail-releases-nonviolent-inmates-in-light-of-coronavirus/article_a6046904-18ff-532a-9dba-54a58862c50b.html).

<sup>4</sup> Advisory from California Chief Justice Tani Cantil-Sakauye to Presiding Judges and Court Executive Officers of the California Courts (Mar. 20, 2020), <https://newsroom.courts.ca.gov/news/california-chief-justice-issues-second-advisory->

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[on-emergency-relief-measures.](#)

<sup>5</sup> *Standing Order of the Sacramento Superior Court*, No. SSC-20-PA5 (Mar. 17, 2020), <https://www.saccourt.ca.gov/general/standing-orders/docs/ssc-20-5.pdf>.

<sup>6</sup> Kyle C. Barry, *Some Supreme Courts Are Helping Shrink Jails to Stop Outbreaks. Others Are Lagging Behind.*, The Appeal (Mar. 25, 2020), <https://theappeal.org/politicalreport/some-supreme-courts-are-helping-shrink-jails-coronavirus>; John Cheves, *Chief Justice Pleads for Kentucky Inmate Release Ahead of COVID-19 but Progress Slow*, Lexington Herald Leader (Mar. 23, 2020), <https://www.kentucky.com/news/coronavirus/article241428266.html>.

<sup>7</sup> Emergency Order Vacating Warrants for Unpaid Fines, Unpaid Restitution, Unpaid Court-Appointed Counsel Fees, and Other Criminal Fees (Mar. 17, 2020), <https://www.courts.maine.gov/covid19/emergency-order-vacating-warrants-fines-fees.pdf>.

<sup>8</sup> Joint Statement of Chief Justice Bridget M. McCormack, Mich. Sup. Ct. and Sheriff Matt Saxton, Exec. Dir., Mich. Sheriff Ass'n (Mar. 26, 2020), [https://courts.michigan.gov/News-Events/press\\_releases/Documents/CJ%20and%20MSA%20Joint%20Statement%20draft%202%20\(003\).pdf](https://courts.michigan.gov/News-Events/press_releases/Documents/CJ%20and%20MSA%20Joint%20Statement%20draft%202%20(003).pdf).

<sup>9</sup> Letter from Chief Justice Mike McGrath, Mont. Sup. Ct. to Mont. Ct. of Ltd. Jurisdiction Judges (Mar. 20, 2020), <https://courts.mt.gov/Portals/189/virus/Ltr%20to%20COLJ%20Judges%20re%20COVID-19%20032020.pdf?ver=2020-03-20-115517-333>.

<sup>10</sup> Consent Order, *In the Matter of the Request to Commute or Suspend County Jail Sentences*, No. 084230 (N.J. March 22, 2020), [https://www.aclu-nj.org/files/5415/8496/4744/2020.03.22\\_-\\_Consent\\_Order\\_Filed\\_Stamped\\_Copy-1.pdf](https://www.aclu-nj.org/files/5415/8496/4744/2020.03.22_-_Consent_Order_Filed_Stamped_Copy-1.pdf).

<sup>11</sup> *People of the State of New York, ex rel., v. Cynthia Brann*, No. 260154/2020 (Sup. Ct. NY Mar. 25, 2020), [https://linkprotect.cudasvc.com/url?a=https%3a%2f%2flegalaidnyc.org%2fwp-content%2fuploads%2f2020%2f03%2fLAS-Mass-Parole-Holds-Writ.pdf&c=E,1,pDbcoVtCJ0c6j6E8cI3m276yaRsx-nztikQuvDWwS91mRHj6RhL8o5pEJmJl-lk86sC7-f1rq9dTih2Pe3ZmAUcoZCiC9er2g4Z4mL\\_ToQ.&typo=1](https://linkprotect.cudasvc.com/url?a=https%3a%2f%2flegalaidnyc.org%2fwp-content%2fuploads%2f2020%2f03%2fLAS-Mass-Parole-Holds-Writ.pdf&c=E,1,pDbcoVtCJ0c6j6E8cI3m276yaRsx-nztikQuvDWwS91mRHj6RhL8o5pEJmJl-lk86sC7-f1rq9dTih2Pe3ZmAUcoZCiC9er2g4Z4mL_ToQ.&typo=1); see also Frank G. Runyeon, *NY Judges Release 122 Inmates as Virus Cases Spike in Jails*, Law360 (March 27, 2020), <https://www.law360.com/newyork/articles/1257871/ny-judges-release-122-inmates-as-virus-cases-spike-in-jails>.

<sup>12</sup> *Jeffrey v. Bran*, (Sup. Ct. NY Mar. 26, 2020). See Press Release, Redmon Haskins, *Legal Aid Wins Release of 16 Incarcerated New Yorkers at a High Risk of COVID-19 from City Jails* (Mar. 26, 2020),



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<https://legalaidnyc.org/wp-content/uploads/2020/03/03-26-20-Legal-Aid-Wins-Release-of-16-Incarcerated-New-Yorkers-at-a-high-risk-of-COVID-19-from-City-Jails.pdf>;

see also Runyeon, *NY Judges Release 122 Inmates*, *supra* note 11.

<sup>13</sup> Press Conference, Ohio Chief Justice Maureen O'Connor and Gov. Mike DeWine (Mar. 19, 2020); *see also* WLWT5, *Release Ohio Jail Inmates Vulnerable to Coronavirus, Chief Justice Urges* (Mar. 19, 2020), <https://www.wlwt.com/article/release-ohio-jail-inmates-vulnerable-to-coronavirus-chief-justice-urges/31788560#>.

<sup>14</sup> Memorandum from Chief Justice Beatty, Sup. Ct of S.C to Magistrates, Mun. Judges, and Summary Ct. Staff (March 16, 2020), <https://www.sccourts.org/whatsnew/displayWhatsNew.cfm?indexId=2461>.

<sup>15</sup> Ryan Autullo, *Travis County Judges Releasing Inmates to Limit Coronavirus Spread*, Statesman (Mar. 16, 2020), <https://www.statesman.com/news/20200316/travis-county-judges-releasing-inmates-to-limit-coronavirus-spread?fbclid=IwAR3VKawwn3bwSLSO9jXBxXNRuaWd1DRLsCBFc-ZkPN1INWW8xnzLPvZYNO4>.

<sup>16</sup> Order, *Administrative Order for Court Operations During Pandemic* (Utah Mar. 21, 2020), <https://www.utcourts.gov/alerts/docs/20200320%20-%20Pandemic%20Administrative%20Order.pdf>.

<sup>17</sup> Am. Order, *In the Matter of Statewide Response by Washington State Courts to the Covid-19 Public Health Emergency*, No. 25700-B-607 (Wash. Mar. 20, 2020), <http://www.courts.wa.gov/content/publicUpload/Supreme%20Court%20Orders/Supreme%20Court%20Emergency%20Order%20re%20CV19%20031820.pdf>.

<sup>18</sup> Order Adopting Temporary Plan to Address Health Risks Posed by the COVID-19 Pandemic, *In the Matter of the Wyoming Supreme Court's Temporary Plan Regarding COVID-19 Pandemic* (Wyo. Mar. 18, 2020), <http://www.courts.state.wy.us/wp-content/uploads/2020/03/COVID-19-Order.pdf>.

<sup>19</sup> Minute Order, *United States v. Michaels*, 8:16-cr-76-JVS, (C.D. Cal. Mar. 26, 2020), [https://drive.google.com/file/d/1BeWih63M7FKreKEvLJyIQevYSivGA\\_PU/view](https://drive.google.com/file/d/1BeWih63M7FKreKEvLJyIQevYSivGA_PU/view).

<sup>20</sup> Edmund H. Mahony, *Courts Ponder the Release of Low Risk Inmates in an Effort to Block the Spread of COVID-19 to the Prison System*, Hartford Currant (Mar. 24, 2020), <https://www.courant.com/coronavirus/hc-news-covid-inmate-releases-20200323-20200324-oreyf4kbfbe3adv6u6ajsj57u-story.html>.

<sup>21</sup> Minute Order, *United States v. Jaffee*, No. 19-cr-88 (RDM) (D.D.C. Mar. 26, 2020), <https://drive.google.com/file/d/1AYHtU6QKCOElpX5Vh3Af6BDqO8goZ5WE/view>.

<sup>22</sup> *United States v. Harris*, No. 19-cr-356 (RDM) (D.D.C. Mar. 26, 2020), <https://drive.google.com/file/d/1aO3BNOKB8ukL20A76Mu7Fn0GyCng0Ras/view>.

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- <sup>23</sup> *United States v. Barkma*, No. 19-cr-0052 (RCJ-WGC), 2020 U.S. Dist. LEXIS 45628, at \*3 (D. Nev. Mar. 17, 2020), [https://drive.google.com/file/d/1o35MokiprkmhzCUUieg\\_Eua6e05v4zOw/view](https://drive.google.com/file/d/1o35MokiprkmhzCUUieg_Eua6e05v4zOw/view).
- <sup>24</sup> *United States v. Copeland*, No. 2:05-cr-135-DCN, at 7 (D.S.C. Mar. 24, 2020), <https://drive.google.com/file/d/1tyA8Kjvld23QTLWo7xbAdqLEOCCVC4q/view>.
- <sup>25</sup> *United States v. Garlock*, No. 18-CR-00418-VC-1, 2020 WL 1439980, at \*1 (N.D. Cal. Mar. 25, 2020), [https://drive.google.com/file/d/1H47EQMXtQZkXFv\\_GXSffAV6Xkse3-kpl/view](https://drive.google.com/file/d/1H47EQMXtQZkXFv_GXSffAV6Xkse3-kpl/view).
- <sup>26</sup> *In The Matter Of The Extradition Of Alejandro Toledo Manrique*, No. 19-mj-71055-MAG, 2020 WL 1307109, at \*1 (N.D. Cal. Mar. 19, 2020), <https://drive.google.com/file/d/1AfU1ft4Lcm60QbPhjgo9HgGAHkbPKPzD/view>.
- <sup>27</sup> AM. Order, *United States v. Perez*, 19-cr-297 (PAE), at 1 (S.D.N.Y. Mar. 19, 2020), <https://drive.google.com/file/d/17xE8qdGeeTI2d2dWjNDfwmXLc8GxTtfA/view>.
- <sup>28</sup> *United States v. Stephens*, No. 15-cr-95-AJN, 2020 WL 1295155, at \*2-3 (S.D.N.Y. Mar. 19, 2020), <https://drive.google.com/file/d/1hEhz9olCfaKRinDvUOKqjDTcx3-nc4vq/view>.
- <sup>29</sup> *Xochihua-Jaimes v. Barr*, No. 18-cv-71460 (9th Cir. Mar. 23, 2020), <https://drive.google.com/file/d/16eh6qMzihmNlSEq0SzmCSQx98OiLn38l/view>.
- <sup>30</sup> *Castillo v. Barr*, No. 20-cv-605 (TJH)(AFM), at 10 (C.D. Cal. Mar. 27, 2020), <https://drive.google.com/file/d/1BeFuU-Lrjj-VVeA6QA2O7zLud7aWivEN/view>.
- <sup>31</sup> Transcript of Oral Argument, at 3-4, 6, *Jimenez v. Wolf*, No. 18-10225-MLW (D. Mass. Mar. 26, 2020), <https://www.courtlistener.com/recap/gov.uscourts.mad.195705/gov.uscourts.mad.195705.507.1.pdf>.
- <sup>32</sup> *Jovel v. Decker*, No. 12-cv-308 (GBD), at 2 (S.D.N.Y. Mar. 26, 2020), <https://drive.google.com/file/d/1mrJ9WbCgNGeyWn1cy3xAvo61yJWnaDe8/view>.
- <sup>33</sup> *Coronel v. Decker*, No. 20-cv-2472 (AJN), at 10 (S.D.N.Y. Mar. 27, 2020), <https://legalaidnyc.org/wp-content/uploads/2020/03/20cv2472-Op.-Order-3.27.20.pdf>.
- <sup>34</sup> *Basank v. Decker*, No. 20-cv-2518 (AT), at 7, 10 (S.D.N.Y. Mar. 26, 2020), [https://drive.google.com/file/d/1FJ7tU9JCskKPh4xkoe4j3YgoQ5y2\\_y0P/view](https://drive.google.com/file/d/1FJ7tU9JCskKPh4xkoe4j3YgoQ5y2_y0P/view).