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6 Attorneys for Defendant
 MICHAEL PLANET, IN HIS OFFICIAL
 7 CAPACITY AS COURT EXECUTIVE
 OFFICER/CLERK OF THE VENTURA
 8 COUNTY SUPERIOR COURT

9 UNITED STATES DISTRICT COURT
 10 CENTRAL DISTRICT OF CALIFORNIA

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 13 COURTHOUSE NEWS SERVICE,

14 Plaintiff,

15 v.

16 MICHAEL PLANET, IN HIS
 OFFICIAL CAPACITY AS COURT
 17 EXECUTIVE OFFICER/CLERK OF
 THE VENTURA COUNTY
 18 SUPERIOR COURT,

19 Defendant.

Case No. CV11-08083 R (MANx)

Assigned for all purposes to
 Hon. Manuel L. Real

**JOINT STIPULATION TO
 CONTINUE HEARING ON
 PLAINTIFF'S MOTION FOR
 PRELIMINARY INJUNCTION
 FROM NOVEMBER 7, 2011 TO
 NOVEMBER 21, 2011**

**DECLARATION OF ERICA L.
 REILLEY IN SUPPORT
 THEREOF**

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1 STIPULATION

2 WHEREAS Plaintiff Courthouse News Service filed on September 29, 2011,
3 a Complaint for Injunctive and Declaratory Relief simultaneous with a Motion for
4 Preliminary Injunction set for hearing on November 7, 2011;

5 WHEREAS Defendant Michael D. Planet's opposition to Plaintiff's Motion
6 for Preliminary Injunction currently is due on October 17, 2011, before his
7 responsive pleading to the Complaint is due;

8 WHEREAS Defendant desires additional time to consider and respond to the
9 serious and important issues raised by Plaintiff's Motion for Preliminary Injunction;
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11 WHEREAS, while Plaintiff is prepared to and prefers that the hearing be
12 held as scheduled on November 7, 2011, Plaintiff is willing, solely as a courtesy to
13 Defendant, and as set forth in Plaintiff's Opposition to Defendant's *Ex Parte*
14 Application for a Continuance, to stipulate to a brief extension of the hearing date;

15 WHEREAS, Defendant agrees that Plaintiff's willingness to enter into this
16 stipulation will not be used as a basis for arguing that Plaintiff will not suffer
17 irreparable harm in the absence of preliminary relief;

18 WHEREAS the deadlines for these filings have not been the subject of any
19 prior continuances.

20 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**
21 by and between the parties hereto, through their respective attorneys of record, that
22 the hearing on Plaintiff's Motion for Preliminary Injunction shall be continued from
23 November 7, 2011, to November 21, 2011, and the following schedule will govern
24 briefing on Plaintiff's Motion for Preliminary Injunction:
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Event

Due Date

Defendant's Opposition to Plaintiff's Motion
for Preliminary Injunction

October 31, 2011

Plaintiff's Reply on Motion for Preliminary
Injunction

November 7, 2011

Hearing on Plaintiff's Motion for Preliminary
Injunction

November 21, 2011

Dated: October 14, 2011

Respectfully submitted,

JONES DAY

By: /s/ Erica L. Reilley
Erica L. Reilley

Attorneys for Defendant
MICHAEL PLANET, IN HIS OFFICIAL
CAPACITY AS COURT EXECUTIVE
OFFICER/CLERK OF THE VENTURA
COUNTY SUPERIOR COURT

Dated: October 14, 2011

HOLME ROBERTS & OWEN LLP

By: /s/ Rachel Matteo-Boehm
Rachel Matteo-Boehm

Attorneys for Plaintiff
COURTHOUSE NEWS SERVICE

