

1 C.D. Michel - SBN 144258
 Joshua R. Dale - SBN 209942
 2 Joseph A. Silvoso, III - SBN 248502
 Anna M. Barvir - SBN 268728
 3 MICHEL & ASSOCIATES, P.C.
 180 East Ocean Blvd., Suite 180
 4 Long Beach, CA 90802
 Telephone: (562) 216-444
 5 Facsimile: (5662) 216-4445
 6 Email: cmichel@michellawyers.com

7 Attorneys for Plaintiff

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9 UNITED STATES DISTRICT COURT
 10 EASTERN DISTRICT OF CALIFORNIA

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12 CALIFORNIA RIFLE & PISTOL
 ASSOCIATION, INCORPORATED,

13 Plaintiff,

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v.

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16 BUREAU OF ALCOHOL, TOBACCO,
 FIREARMS, AND EXPLOSIVES, et
 al.,

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Defendant.

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CASE NO: 1:14-cv-01211 JAM-SAB

**STIPULATION OF PARTIES TO
 CONTINUE HEARING AND TO EXTEND
 ASSOCIATED DEADLINES; ORDER**

(Fed. R. Civ. P. 6(b)(1)(A);
 Local Rules 144, 230(f))

1 **I. INTRODUCTION**

2 The parties, Plaintiff California Rifle and Pistol
3 Association and Defendants Bureau of Alcohol, Tobacco, Firearms,
4 and Explosives, Attorney General Eric Holder, and ATF Director B.
5 Todd Jones, through their respective attorneys of record, hereby
6 jointly stipulate to continue the date of the hearing for
7 Defendants' Motion to Dismiss, or Alternatively, for Summary
8 Judgment and to extend the remaining deadlines for filing moving
9 papers related to that motion in accordance with the stipulated
10 schedule set forth below.

11 This request is made pursuant to Rule 6 of the Federal Rules
12 of Civil Procedure and Rules 144 and 230 of the Local Rules of
13 the Eastern District of California.

14 **II. RECITALS / GROUNDS FOR RELIEF**

15 WHEREAS, Plaintiffs filed their initial Complaint in this
16 matter on July 31, 2014;

17 WHEREAS, Defendants filed their Motion to Dismiss, or
18 Alternatively, for Summary Judgment on January 9, 2015;

19 WHEREAS, Defendants noticed their Motion to Dismiss, or
20 Alternatively, for Summary Judgment for March 25, 2015 at 9:30
21 a.m. in the courtroom of the Honorable John A. Mendez;

22 WHEREAS, pursuant to Local Rule 230(c), Plaintiff must file
23 its Opposition to Defendants' Motion to Dismiss, or
24 Alternatively, for Summary Judgment on or before March 11, 2015;

25 WHEREAS, Local Rule 144(a) of this Court allows a 28-day
26 extension of time for responding to complaints and filing certain
27 other documents by initial stipulation of the parties without
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1 approval of the court, but states that "[a]ll other extensions of
2 time must be approved by the Court";

3 WHEREAS, Rule 6(b)(1)(A) of the Federal Rules of Civil
4 Procedure allows for the extension of time for *good cause*, "if a
5 request is made, before the original time or its extension
6 expires";

7 WHEREAS, good cause for an extension of time is shown in
8 that Plaintiff is currently considering voluntary dismissal of
9 this matter and has expressed such to Defendants;

10 WHEREAS, the continuance and extension requested herein will
11 conserve both the Court's and all parties' time and resources and
12 promote judicial economy by attempting to avoid the preparation
13 and consideration of unnecessary briefing and argument on
14 Defendants' Motion to Dismiss, or Alternatively, for Summary
15 Judgment;

16 WHEREAS, both parties to this action seek to keep the costs
17 of litigation as low as reasonably possible;

18 WHEREAS, this request for continuance and extension is made
19 in good faith, and it is not for the purpose of unnecessary
20 delay; and

21 WHEREAS, neither party has obtained an extension of time
22 relating to any matter for which this extension is sought.

23 THE PARTIES STIPULATE AND AGREE TO THE FOLLOWING:

24 1. The hearing on Defendants' Motion to Dismiss, or
25 Alternatively, for Summary Judgment shall be continued to May 6,
26 2015 at 9:30 a.m.;

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