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7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 GOVERNMENT APP SOLUTIONS, INC.,

11 Plaintiff,

12 v.

13 FEDERAL BUREAU OF INVESTIGATION,
et al.,

14 Defendants.
15

CASE NO. 2:21-CV-00696-TLN-KJN

STIPULATION AND ORDER TO CONTINUE
DEADLINE TO RESPOND TO COMPLAINT

JUDGE: Hon. Troy L. Nunley

16
17 Plaintiff Government App Solutions, Inc., and defendants the United States of America, sued
18 herein as the Federal Bureau of Investigation and the United States Attorney's Office for the Eastern
19 District of California; Michael Anderson; Amy S. Hitchcock; Rebekah Bills; and Rachael LaChapelle
20 (together, the "Federal Defendants") jointly stipulate and respectfully request that the Court continue the
21 deadline for the Federal Defendants to respond to the First Amended Complaint ("FAC") (ECF 6) by
22 one week, to September 20, 2021. Good cause for the requested extension exists for the following
23 reasons.

24 The deadline for the Federal Defendants to respond to the complaint currently is September 13,
25 2021. *See* ECF 21 at 3. Counsel for plaintiff and counsel for the Federal Defendants have been meeting
26 and conferring with the goal of narrowing the issues that must be resolved by the Court through a
27 motion to dismiss the claims against the Federal Defendants. As part of the meet and confer process,
28 counsel for plaintiff requires one additional week to conduct legal research. Accordingly, the parties

1 jointly stipulate and request that the Court extend the deadline for the Federal Defendants to respond to
2 the FAC by one week, to September 20, 2021, so the parties may conclude the meet and confer process.

3 Respectfully submitted,

4 Dated: September 8, 2021

PHILLIP A. TALBERT
Acting United States Attorney

6 By: /s/ Philip A. Scarborough

PHILIP A. SCARBOROUGH
Assistant United States Attorney

8 Attorneys for defendants the United States,
9 Rebekah Bills, Rachel LaChapelle, Michael
Anderson, and Amy S. Hitchcock

10 Dated: September 8, 2021

CYRUS ZAL, A PROFESSIONAL
CORPORATION

12 By: /s/ Cyrus Zal

CYRUS ZAL

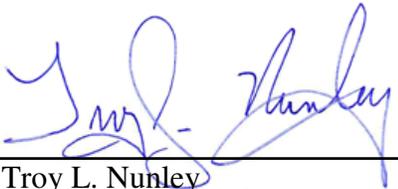
14 Attorney for plaintiff Government App
Solutions, Inc.

16 **ORDER**

17 Good cause appearing, the stipulation of plaintiff Government App Solutions, Inc., and
18 defendants Rebekah Bills, Rachael LaChapelle, Michael Anderson, Amy S. Hitchcock, and the United
19 States, sued herein as the Federal Bureau of Investigation and the United States Attorney's Office for the
20 Eastern District of California (together, the "Federal Defendants"), is hereby APPROVED. The
21 deadline for the Federal Defendants to respond to the First Amended Complaint (ECF 6) is continued to
22 September 20, 2021.

23 IT IS SO ORDERED.

24 Dated: September 9, 2021

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26 _____
Troy L. Nunley
27 United States District Judge
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