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7 Specially appearing for  
 Federal Defendants  
 8

9 UNITED STATES DISTRICT COURT  
 10 NORTHERN DISTRICT OF CALIFORNIA  
 11 EUREKA DIVISION

12	BROOKTRAILS TOWNSHIP	)	No. C12-5576 NJV
13	COMMUNITY SERVICES DISTRICT, a	)	
	public agency,	)	STIPULATION AND [ <del>PROPOSED</del> ]
14	Plaintiff,	)	ORDER EXTENDING TIME TO
		)	RESPOND TO COMPLAINT AND
15	v.	)	CONTINUING INITIAL CASE
		)	MANAGEMENT CONFERENCE
16	UNITED STATES DEPARTMENT OF	)	
	AGRICULTURE, RURAL	)	
17	DEVELOPMENT; JOSEPH SHUNK,	)	
		)	
18	Defendants.	)	

19  
 20 The parties previously stipulated that the defendants would have an extension of time  
 21 December 31, 2012 to answer, move, or otherwise respond to the Complaint for Injunctive Relief  
 22 (“Complaint”) in this action if certain partial production of documents was done. That  
 23 production was done, and defendant USDA has committed to a further rolling production with  
 24 the plan of completing the response and production relating to plaintiff’s Freedom of Information  
 25 Act request by January 18, 2013. The parties are hopeful that this rolling production may lead to  
 26 the dismissal of this action.

27 In order to allow for the completion of the production and plaintiff’s review of the  
 28 documents and any claimed exemptions, the parties wish to further extend the deadline for

1 defendants' response to the Complaint, as well as the initial case management conference,  
2 currently scheduled for January 29, 2013.

3 Accordingly, pursuant to Civil Local Rule 6-1(a), the parties to this action hereby  
4 stipulate and request that the defendants shall have an extension of time to January 31, 2013 to  
5 answer, move, or otherwise respond to the Complaint.

6 The parties further stipulate and request that the initial case management conference,  
7 currently scheduled to take place on January 29, 2013, be continued to February 26, 2013, and  
8 that the related case management dates be continued accordingly.

9 IT IS SO STIPULATED.

10 Respectfully submitted,

11 DATED: December 17, 2012

NEARY and O'BRIEN

12 /s/ Christopher J. Neary

13 CHRISTOPHER J. NEARY

Attorney for Plaintiffs

14 DATED: December 18, 2012

MELINDA HAAG  
United States Attorney

15 /s/ Claire T. Cormier

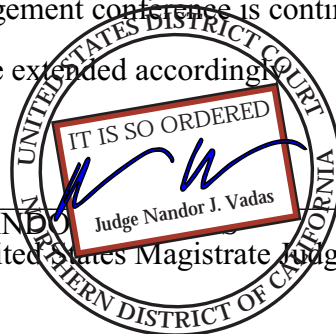
16 CLAIRE T. CORMIER<sup>1</sup>  
Assistant United States Attorney

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18  
19  
20 **[PROPOSED] ORDER**

21 Pursuant to the stipulation of the parties and good cause appearing, the deadline for  
22 defendants to answer, move, or otherwise respond to the Complaint in this action is extended to  
23 January 31, 2013. The initial case management conference is continued to February 26, 2013,  
24 and other case management deadlines are extended accordingly.

25 DATE: December 19, 2012

26 NANDOR J. VADAS  
United States Magistrate Judge



27  
28 <sup>1</sup> I, Claire T. Cormier, hereby attest that Mr. Neary authorized me to electronically sign  
this document on his behalf.