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14 Attorneys for Plaintiffs

15 IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA

16 FAITH CENTER CHURCH
 17 EVANGELISTIC MINISTRIES, et al.,

18 Plaintiffs,

19 v.

20 FEDERAL D. GLOVER, et al.,

21 Defendants.
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CASE NO. C-04-3111 JSW

**DECLARATION OF TIMOTHY D.
 CHANDLER IN SUPPORT OF
 STIPULATED REQUEST TO EXTEND
 TIME FOR PARTIES TO FILE
 DISPOSITIVE MOTIONS**

1 I, Timothy D. Chandler, declare as follows:

2 1. I am an attorney duly licensed to practice law before the courts of California. I
3 am lead counsel for Plaintiffs in the above-captioned case. Pursuant to Civil Local Rule 6-2, I
4 submit this declaration in support of the parties' stipulated request for an order extending the
5 time for the parties to file dispositive motions until September 8, 2008.

6 2. In accordance with this Court's Supplemental Case Management Order dated
7 January 18, 2008, the current deadline for the parties to file dispositive motions is August 25,
8 2008.

9 3. Over the past two weeks, several unexpected matters have arisen that have created
10 the need for this extension. Most notably, two extremely time-sensitive election-related matters
11 arose that involved emergency writ petitions in the California Superior Court, as well as an
12 immediate hearing and additional writ petition in the California Court of Appeal. These matters
13 had to be resolved prior to the State Printer beginning to print the ballots for the November 2008
14 election, which began on Monday, August 11, 2008. As a result, it was impossible for me to
15 postpone those matters until after the dispositive motion deadline in this case.
16

17 4. This case raises important and unsettled issues of constitutional law regarding
18 religious worship in public forums. This extension is necessary to ensure that Plaintiffs' counsel
19 can fully and adequately prepare a dispositive motion addressing these important legal issues.

20 5. There have been no previous time modifications in this case related to the parties'
21 dispositive motions. The only time modifications that have occurred in this case involved the
22 parties' Early Neutral Evaluation Session, which the parties filed stipulated requests to postpone
23 because of a pending motion for preliminary injunction (Document #37) and a pending appeal
24 following this Court's granting of the motion for preliminary injunction (Document #63). The
25 parties also requested a continuance of a Case Management Conference due to an appeal that
26 was still pending in regard to the preliminary injunction that was issued in this case (Document
27 #81).

28 6. The only other dates that are set on the calendar for this case is the pretrial

1 conference, which is set for January 12, 2009, and the trial, which is set for February 9, 2009.

2 The requested extension would have no effect on these dates.

3 7. I do not anticipate requesting any additional extensions in this case.

4
5 I declare under the penalty of perjury that the foregoing is true and correct.

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7 Dated: August 13, 2008

ALLIANCE DEFENSE FUND

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9 By: /s/Timothy D. Chandler
10 TIMOTHY D. CHANDLER
11 Attorney for Plaintiffs
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