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18 Attorneys for Defendant

19 UNITED STATES DEPARTMENT OF JUSTICE

20 UNITED STATES DISTRICT COURT

21 NORTHERN DISTRICT OF CALIFORNIA

22 SAN FRANCISCO DIVISION

23 WILLIAM PICKARD,

24 Plaintiff,

25 v.

26 UNITED STATES DEPARTMENT OF  
27 JUSTICE,

28 Defendant.

) CASE NO. C 06-0185 CRB (NC)

) **STIPULATION TO EXTEND TIME;**  
) **~~PROPOSED~~ ORDER AS MODIFIED**

29 Subject to the approval of the Court, the parties hereby stipulate as follows:

30 The government’s response to the Court’s Tentative Ruling Ordering Release of Documents  
31 Following In Camera Review (ECF No. 227) (the “Tentative Ruling”), currently due on February 8,  
32 2016, will now be due on February 18, 2016. The reason for the requested extension is as follows: The  
33 government anticipates submitting a supplemental declaration from DEA attorney William Little as part  
34 of its response to the Court’s tentative ruling. Mr. Little is located in Washington, D.C. Due to the

1 recent blizzard, Mr. Little was unable to go to work from noon on January 22, 2016, through and  
2 including January 28, 2016. As a result, and combined with Mr. Little's other work requirements, the  
3 government respectfully requests additional time to submit its response to the Tentative Ruling.

4 Correspondingly, the parties also stipulate to continue the deadline for the status reports and the  
5 telephonic case management conference as follows:


6 Government response to Tentative Ruling due: February 18, 2016 (continued from February 8,  
7 2016)

8 Status reports due: March 2, 2016 (continued from February 10, 2016)

9 Telephonic case management conference: March <sup>16</sup>~~9~~, 2016, at 11:00 a.m. (continued from  
10 February 17, 2016, at 11:00 a.m.)


11 Plaintiff agrees to the requested extension, but states his position as follows: "As of Jan. 11,  
12 2016, this case has now been pending for a decade. The government's overbroad and unjustifiable  
13 exemption claims have already dragged this case on for far, far too long, and -- unless the government  
14 intends to undertake a wholesale reevaluation of its position in this litigation -- additional time will not  
15 cure that problem. However, as a matter of professional courtesy, counsel for Mr. Pickard consents to  
16 the extension the government seeks. Mr. Pickard looks forward to expeditiously resolving this case."

17  
18  
19 DATED: Jan 29, 2016

By:   
MARK RUMOLD  
Attorney for Plaintiff

22 BRIAN J. STRETCH  
Acting United States Attorney

23  
24 DATED: 1/29/16

By:   
NEILL T. TSENG  
Assistant United States Attorney  
Attorneys for Defendant

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED; AS MODIFIED**

2  
3  
4 DATED: February 1, 2016

By:

HONORABLE NATHANAEL M. COUSINS  
UNITED STATES DISTRICT COURT

