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7 Attorneys for Defendants

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

11	SETH ROSENFELD,)	No. C 07-3240 MHP
)	
12	Plaintiff,)	Related Cases: No. C 85-1709 MHP;
)	No. C 85-2247 MHP; No. C 90-3576 MHP
13	v.)	
)	
14	UNITED STATES DEPARTMENT OF)	STIPULATION AND JOINT MOTION
	JUSTICE, and UNITED STATES)	
15	FEDERAL BUREAU OF)	
	INVESTIGATION,)	
16	Defendants.)	
17)	TO EXTEND DEADLINE FOR FILING
)	OF JOINT CASE MANAGEMENT
)	CONFERENCE STATEMENT;
)	[PROPOSED] ORDER

18 Subject to the Court’s approval, the parties, through their undersigned counsel, hereby
 19 agree and stipulate that the deadline for submission of their joint case management conference
 20 statement will be extended from February 2, 2009 to February 5, 2009.

21 The parties are scheduled to appear for a case management conference on Monday,
 22 February 9, 2009. Plaintiff intends to include in the joint case management conference statement
 23 a detailed analysis containing (1) his suggested course of action; (2) his objections to defendants’
 24 evidence submitted in response to the Court’s order, dated August 22, 2008; (3) his statement
 25 regarding defendants’ alleged failure to adequately search for responsive records; and (4) his
 26 report regarding defendants’ compliance with agreed-upon productions. Plaintiff has not yet
 27 provided defendants with his portion of the joint statement, and, as a result, defendants have not

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STIPULATION AND JOINT MOTION TO EXTEND DEADLINE FOR SUBMISSION OF JOINT CASE
 MANAGEMENT CONFERENCE STATEMENT; [PROPOSED] ORDER
 C 07-03240 MHP

1 yet had an opportunity to review plaintiff's analysis. The brief extension will give defendant
2 time to prepare a response to plaintiff's proposals and will thus ensure that the joint case
3 management conference statement provides the Court with a complete picture of the parties'
4 respective positions.

5 **IT IS SO STIPULATED.**

6
7 Respectfully submitted,

8 Dated: February 2, 2009

FIRST AMENDMENT PROJECT

9
10 By: /s/
11 DAVID GREENE
Attorneys for Plaintiff

12 Dated: February 2, 2009

JOSEPH P. RUSSONIELLO
United States Attorney

14 By: /s/
15 ELLEN M. FITZGERALD
16 Assistant United States Attorney
17 Attorneys for Defendants

18 **APPROVED AND SO ORDERED.**

19 The deadline for submission of the parties' joint case management conference statement
20 is hereby extended from February 2, 2009 to February 5, 2009.

21
22
23 DATED: 2/4/2009 _____

