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18 UNITED STATES DISTRICT COURT
 19 NORTHERN DISTRICT OF CALIFORNIA
 20 SAN FRANCISCO DIVISION

21	PEOPLE OF THE STATE OF CALIFORNIA, <i>ex rel.</i> EDMUND G. BROWN JR., ATTORNEY GENERAL OF THE STATE OF CALIFORNIA,)	Case No. C 08-02741 MEJ
22)	
23	Plaintiff,)	
24)	STIPULATION AND
	v.)	PROPOSED ORDER
25)	
26	UNITED STATES FOOD & DRUG ADMINISTRATION,)	Before: Hon. Maria-Elena James
27	Defendant.)	

28 Whereas on March 19, 2009, defendant received additional guidance from the United States Attorney General regarding further handling of Freedom of Information Act matters

1 pending before federal agencies; and

2 Whereas defendant considered the application of the March 19, 2009 guidance to the
3 above-captioned matter; and

4 Whereas defendant concluded that an additional disclosure was appropriate pursuant to
5 the guidance and such disclosure was made June 30, 2009, and

6 Whereas the due date for plaintiff to file a motion for summary judgment is July 2, 2009;
7 and

8 Whereas, plaintiff now must review defendant's June 30, 2009 disclosure and must
9 decide whether to file a motion for summary judgment;

10 The parties therefore agree, stipulate and respectfully request that the Court issue an order
11 making the following changes to the current scheduling order:

12 Thursday, July 23, 2009	Plaintiff to file Motion for Summary Judgment, if any.
13 Thursday, August 6, 2009	Defendant to file opposition and cross-motion, if any.
14 Thursday, August 20, 2009	Plaintiff to file reply and opposition to cross-motion, if 15 any.
16 Thursday, September 3, 2009	Defendant to file reply, if any.
17 Thursday, September 24, 2009	Hearing on cross-motions.

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19 EDMUND G. BROWN JR.
Attorney General of the State of California

Respectfully submitted,
20 JOSEPH P. RUSSONIELLO
United States Attorney

21 _____
/s/
22 LAURA J. ZUCKERMAN
Deputy Attorney General
Dated: March 18, 2009

23 _____
/s/
24 ABRAHAM A. SIMMONS
Assistant United States Attorney
Dated: March 18, 2009

25 ~~PROPOSED~~ ORDER

26 Good cause appearing, it is so ORDERED.

27 July 2, 2009

28 _____
Date

Judge Maria Elena James

