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13 Attorneys for Defendants

14 UNITED STATES DISTRICT COURT  
 15 NORTHERN DISTRICT OF CALIFORNIA  
 16 SAN FRANCISCO DIVISION

17 TRI-VALLEY CARES,	)	No. C 08-5408 SC
	)	
18 Plaintiff,	)	
	)	<b>STIPULATION TO BRIEFING; and</b>
19 v.	)	<b>[Proposed] ORDER</b>
	)	
20 UNITED STATES DEPARTMENT OF	)	
ENERGY and NATIONAL NUCLEAR	)	
21 SECURITY ADMINISTRATION,	)	Date: July 23, 2010
	)	Time: 10:00 a.m.
22 Defendants.	)	
	)	

23  
 24 Plaintiff, Tri-Valley Cares, and defendants, the United States Department of Energy (“DOE”),  
 25 and the National Nuclear Security Administration (“NNSA”), by and through their counsel of  
 26 record, hereby stipulate, subject to the approval of the Court, to the following briefing schedule in  
 27 this Freedom of Information Act (FOIA) case:

28 1. On March 17, 2010, the Court vacated the case management conference scheduled for  
 Stipulation to Briefing  
 C 08-5408 SC

1 March 19, 2010.

2 2. The parties believe this case can be resolved through cross-motions for summary judgment,  
3 in which plaintiff would file its motion first given plaintiff's intent to challenge as of yet  
4 unidentified agency redactions and its pattern and practice claim.

5 3. Accordingly, the parties respectfully ask this Court to set the briefing schedule on the  
6 parties' cross-motions for summary judgment as follows:

7	Plaintiff's Motion for Summary Judgment:	April 16, 2010.
8	Defendants' Cross-Motion and Opposition:	May 17, 2010
9	Plaintiff's Cross-Opposition and Reply:	June 16, 2010
10	Defendants' Reply:	July 1, 2010
11	Hearing:	<b>July 23, 2010 at 10:00 a.m.</b>

12 Dated: March 18, 2010

Respectfully submitted,

JOSEPH P. RUSSONIELLO  
United States Attorney

15 \_\_\_\_\_  
16 /s/  
17 ILA C. DEISS  
Assistant United States Attorney  
Attorney for Defendants

18 ISAAC CAMPBELL  
19 Trial Attorney  
United States Department of Justice

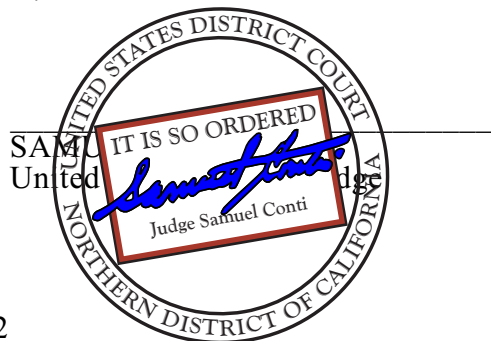
20 Dated: March 18, 2010

21 \_\_\_\_\_  
22 /s/  
SCOTT J. YUNDT  
Attorney for Plaintiff

23 **ORDER**

24 Pursuant to the stipulation, IT IS SO ORDERED.

25  
26 Date: 3/18/10



27  
28 Stipulation to Briefing  
C 08-5408 SC