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7 ATTORNEYS FOR FEDERAL DEFENDANTS

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

11 LONG HAUL, INC. AND EAST BAY )  
 12 PRISONER SUPPORT, )  
 13 Plaintiffs, )  
 14 v. )  
 15 UNITED STATES OF AMERICA; )  
 MITCHELL CELAYA; KAREN )  
 16 ALBERTS; WILLIAM KASISKE; WADE )  
 MACADAM; TIMOTHY J. ZUNIGA; )  
 17 MIKE HART; LISA SHAFFER; AND )  
 DOES 1-25. )  
 18 Defendants. )  
 19 )  
 20 )

No. C 09-0168 JSW

**STIPULATION AND PROPOSED  
 ORDER REGARDING BRIEFING OF  
 CROSS MOTIONS FOR SUMMARY  
 JUDGMENT**

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STIPULATION RE BRIEFING  
 C 09-0168 JSW

1 Plaintiffs Long Haul, Inc. and East Bay Prisoner Support (“plaintiffs”) and defendants  
2 United States of America, Mitchell Celaya, Karen Alberts, William Kasiske, Wade Macadam,  
3 Timothy J. Zuniga, Mike Hart and Lisa Shaffer (collectively, “defendants”) have met and  
4 conferred, by and through their counsel of record, and agreed to the following stipulation:  
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- 6 1. On January 31, 2011, plaintiffs filed a motion for summary judgment (Docket Nos. 106-  
7 111) as permitted by the case management schedule and order in this case (Docket Nos.  
8 79, 105).
- 9 2. Subject to the approval of the Court, defendants will file a joint opposition and cross  
10 motion for summary judgment, including a supporting memorandum of points and  
11 authorities that the parties have agreed will have a forty five (45) page limit. Defendants  
12 will make their filing on or before February 14, 2011, consistent with the existing case  
13 management schedule set forth in Docket #105.
- 14 3. Subject to the approval of the Court, plaintiffs will file a joint opposition to defendants’  
15 cross motion for summary judgment and reply in support of plaintiffs’ motion filed  
16 January 31, including a supporting memorandum of points and authorities that the parties  
17 have agreed will have a forty (40) page limit. Plaintiffs will make their filing on or  
18 before February 28, 2011, consistent with the existing case management schedule set  
19 forth in Docket #105.
- 20 4. Subject to the approval of the Court, defendants will file a joint reply in support of their  
21 motion, including a supporting memorandum of points and authorities that the parties  
22 have agreed will have a twenty (20) page limit. Defendants will make their filing on or  
23 before March 14, 2011, consistent with the existing case management schedule set forth  
24 in Docket #105.
- 25 5. The parties have reached these agreements regarding the page limits for the filings  
26 described above in paragraphs 2 through 4 in order to reduce the number of briefs and  
27 total number of pages the Court and the parties will need to consider.  
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1 **IT IS SO STIPULATED.**

2  
3 DATED: February 3, 2011

ELECTRONIC FRONTIER FOUNDATION

4  
5 /s/

JENNIFER S. GRANICK  
MATT ZIMMERMAN  
Attorneys for Plaintiffs LONG HAUL, INC.  
and EAST BAY PRISONER SUPPORT

6  
7  
8 DATED: February 3, 2011

MELINDA HAAG  
United States Attorney

9  
10 /s/

JONATHAN U. LEE  
NEILL T. TSENG  
Assistant United States Attorneys  
Attorneys for Defendants UNITED STATES OF  
AMERICA, LISA SHAFFER and MIKE HART

11  
12  
13  
14 DATED: February 3, 2011

SCHIFF HARDIN LLP

15 /s/

16 WILLIAM J. CARROLL  
17 Attorneys for Defendants KAREN ALBERTS,  
18 WILLIAM KASISKE, WADE MACADAM, and  
19 TIMOTHY J. ZUNIGA

20 **PROPOSED ORDER**

21 Defendants are granted leave to file a brief not to exceed thirty-five pages in support of their  
22 joint opposition and cross motion for summary judgment by February 14, 2011. Plaintiffs are  
23 granted leave to file a brief not to exceed thirty pages in support of their joint opposition to  
24 defendants' cross motion for summary judgment and their reply in support of plaintiffs' motion,  
by February 28, 2011. Defendants may file a brief not to exceed twenty pages in support of their  
joint reply in support of their cross motion by March 14, 2011.

25 **PURSUANT TO STIPULATION, IT IS SO ORDERED AS MODIFIED.**

26 DATED: February 4, 2011

  
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Honorable Jeffrey S. White  
United States District Judge