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Attorneys for Federal Defendants
 UNITED STATES OF AMERICA, MIKE HART and LISA SHAFFER

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

LONG HAUL, INC. and EAST BAY
 PRISONER SUPPORT,

Plaintiffs,

vs.

UNITED STATES OF AMERICA;
 VICTORIA HARRISON; KAREN
 ALBERTS; WILLIAM KASISKE; WADE
 MACADAM; TIMOTHY J. ZUNIGA; MIKE
 HART; LISA SHAFFER; AND DOES 1-25,

Defendants.

Case No.: C 09-00168 JSW

**STIPULATION AND PROPOSED ORDER
 TO STAY ALL DATES, INCLUDING
 PRETRIAL FILING, PRETRIAL
 CONFERENCE AND AND THE TRIAL
 DATE**

STIP. TO STAY DATES; [PROPOSED] ORDER
 C 09-00168 JSW

1 THE PARTIES, BY AND THROUGH THEIR ATTORNEYS OF RECORD, HEREBY
2 STIPULATE AS FOLLOWS:

- 3 1. With the assistance of Magistrate Judge Ryu, the parties have reached agreement on
4 principles of settlement. Counsel of record have agreed to a form of settlement
5 agreement.
- 6 2. Plaintiffs' counsel is obtaining signatures from each of the plaintiffs, Long Haul and
7 East Bay Prisoner Support, and will provide those signatures to counsel for
8 defendants within the next 5 days.
- 9 3. Counsel for defendants have submitted the form of settlement agreement to their
10 principals for consideration and decision. Counsel for the University Defendants is in
11 the process of obtaining signatures from each of the University Defendants and
12 anticipates that it will provide those signatures to counsel for plaintiffs within 10
13 days. Counsel for the Federal Defendants anticipates that its clients will act on the
14 proposed settlement within 75 days.
- 15 4. In light of the foregoing, the parties request a stay of 90 days on all pending deadlines
16 and hearings in this litigation, including the submission of pretrial papers, the pretrial
17 conference and the trial date.
- 18 5. The parties thank Magistrate Ryu for providing the assistance needed to the progress
19 made thus far.

20 IT IS SO STIPULATED.

21 Dated: 2/8/12

ELECTRONIC FRONTIER FOUNDATION

22 ____/s/_____
23 Matthew Zimmerman, Esq.
24 Marcia Hofmann, Esq.
25 Hanni Fakhoury, Esq.
26 AMERICAN CIVIL LIBERTIES
27 FOUNDATION OF NORTHERN
28 CALIFORNIA
Michael T. Risher, Esq.

Attorneys for Plaintiffs

LONG HAUL INFOSHOP, INC., and
EAST BAY PRISONER SUPPORT

Dated: 2/8/12

MELINDA HAAG
United States Attorney

_____/s/_____
JONATHAN U. LEE
Assistant United States Attorney
Attorneys for Defendant
UNITED STATES OF AMERICA


Dated: 2/8/12

SCHIFF HARDIN LLP

_____/s/_____
WILLIAM J. CARROLL
Attorneys for Defendants
MITCHELL CELAYA, KAREN ALBERTS,
WILLIAM KASISKE, WADE MACADAM
and TIMOTHY J. ZUNIGA

PURSUANT TO STIPULATION, IT IS SO ORDERED. All pending deadlines, including the submission of pretrial papers, the pretrial conference and the trial date are vacated and the Court hereby orders a stay of 90 days. The Court HEREBY SETS a status conference for May 11, 2011 at 1:30 p.m. The parties shall file a joint status statement by no later than May 4, 2011.

DATED: February 9, 2011



HONORABLE JEFFREY S. WHITE
UNITED STATES DISTRICT JUDGE

STIP. TO STAY DATES; [PROPOSED] ORDER
C 09-00168 JSW