

1 MELINDA HAAG (CABN 132612)  
 United States Attorney  
 2 JOANN M. SWANSON (CABN 88143)  
 Chief, Civil Division  
 3 JONATHAN U. LEE (SBN 148792)  
 Assistant United States Attorney  
 4  
 5 450 Golden Gate Avenue, 9th Floor  
 San Francisco, California 94102  
 Telephone: 415-436-6909  
 6 Facsimile: 415-436-6748  
 Email: jonathan.lee@usdoj.gov  
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8 Attorneys for Federal Defendants  
 UNITED STATES OF AMERICA, MIKE HART and LISA SHAFFER

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

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

Case No.: C 09-00168 JSW  
 AMENDED  
**STIPULATION AND PROPOSED ORDER**  
**TO STAY ALL DATES, INCLUDING**  
**PRETRIAL FILING, PRETRIAL**  
**CONFERENCE AND AND THE TRIAL**  
**DATE**

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 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 \_\_\_\_\_  
23 /s/

24 Matthew Zimmerman, Esq.

Marcia Hofmann, Esq.

Hanni Fakhoury, Esq.

25 AMERICAN CIVIL LIBERTIES

26 FOUNDATION OF NORTHERN

CALIFORNIA

27 Michael T. Risher, Esq.

28 Attorneys for Plaintiffs

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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~~ <sup>2012</sup> at 1:30 p.m. The parties shall file a joint status statement by no later than May 4, 2011.

DATED: February 9, 2011

  
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HONORABLE JEFFREY S. WHITE  
UNITED STATES DISTRICT JUDGE