\*E-Filed 2/7/12\*

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10	Attorneys for Plaintiff Electronic Frontier Foundation		
11			
12	IN THE UNITED STATES DISTRICT COURT		
13	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
14	SAN FRANCISCO DIVISION		
15		)	
16	ELECTRONIC FRONTIER FOUNDATION,	) Case No. 4:10-cv-04892-RS	
17	Plaintiff,	) ) ) STIPULATION AND [ <del>PROPOSED]</del>	
18	VS.	) ORDER TO CONTINUE ALL DATES ) FOR PARTIES' CROSS MOTIONS	
19	DEPARTMENT OF JUSTICE,	) FOR FARTIES CROSS MOTIONS ) FOR SUMMARY JUDGMENT BY TWO ) WEEKS	
20	Defendant.	) (Civ. L.R. 6-2]	
21		) ) ) Hon. Richard Seeborg	
22		) Courtroom 3, 17 <sup>th</sup> Floor	
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	Case No. CV-10-04892-RS STIPULATION AND [PROPOSED] ORDER TO CONTINUE ALL DATES FOR PARTIES'		
	CROSS MOTIONS FO	R SUMMARY JUDGMENT	
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1	Pursuant to Fed. R. Civ. P. 6(b)(1) and Civil L.R. 6-2, the parties, by and through		
2	undersigned counsel, have conferred and hereby stipulate to and respectfully request the Court		
3	grant an extension to all dates in the briefing schedule previously submitted to and signed by the		
4	court on January 19, 2012 (Dkt. 32). The new schedule as proposed by the parties is as follows:		
5	Defendant DOJ and its components DEA, DOJ Criminal February 23, 2012 Division and FBI move for summary judgment.		
6	Division and i Di move for summary judgment.		
7	Plaintiff files opposition and cross-moves for summary March 22, 2012 judgment.		
8	Judgment		
9	Defendant files reply and opposition to Plaintiff's motion. April 5, 2012		
10	Plaintiff files reply in support of motion for summary April 19, 2012 judgment.		
11	Judgment.		
12	Hearing on cross motions. May 3, 2012		
13	This requested change will minimally affect the present schedule for the case because it		
14	proposes continuing all dates, including the hearing date on the parties' cross motions for summary		
15	judgment, by just two weeks. In accordance with Civil L.R. 6-2(a), this stipulation is supported by		
16	the Declaration of Jennifer Lynch, counsel for Plaintiff, filed herewith and a proposed order below.		
17	The parties have previously stipulated to a briefing schedule (Dkt. 28) and to one		
18	adjustment to that briefing schedule (Dkt. 32) to accommodate the Defendant and its components'		
19	schedule. The parties now seek to continue all dates due to previously unforeseen scheduling and		
20	caseload issues and because Plaintiff's counsel will be moving immediately prior to the original		
21	date on which EFF's Cross Motion would be due (originally calendared for March 9, 2012). The		
22	parties respectfully request that the schedule above be adopted in place of the schedules previously		
23	proposed.		
24	DATED: February 6, 2012 Respectfully submitted,		
25			
26	<u>_/s/ Jennifer Lynch</u> Jennifer Lynch		
27	ELECTRÓNIC FRONTIER FOUNDATION 454 Shotwell Street		
28	San Francisco, CA 94110		
	Case No. CV-10-04892-RS 1 STIPULATION AND [PROPOSED] ORDER TO CONTINUE ALL DATES		
	FOR PARTIES' CROSS MOTIONS FOR SUMMARY JUDGMENT		
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2	Attorneys for Plaintiff		
3	ELECTRONIC FRONTIER FOUNDATION		
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5	<b>DECLARATION PURSUANT TO GENERAL ORDER 45</b>		
6	I, Jennifer Lynch, hereby declare pursuant to General Order 45 that I have obtained		
7	Defendants' concurrence in the filing of this document from Nicholas Cartier, Counsel for		
8	Defendants.		
9	Executed on February 6, 2012, in San Francisco, California.		
10	(n/ Lours: Con Lours I		
11	/s/ Jennifer Lynch Jennifer Lynch		
12			
13	* * * * * *		
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15	PURSUANT TO STIPULATION, IT IS SO ORDERED.		
16	Dated: _2/7/12		
17	The Hon. RICHARD SEEBORG United States District Judge		
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	Case No. CV-10-04892-RS 2		
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