



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 6 Division and FBI move for summary judgment.	February 23, 2012
7 Plaintiff files opposition and cross-moves for summary 8 judgment.	March 22, 2012
9 Defendant files reply and opposition to Plaintiff's motion.	April 5, 2012
10 Plaintiff files reply in support of motion for summary 11 judgment.	April 19, 2012
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,

26 /s/ Jennifer Lynch  
27 Jennifer Lynch  
28 ELECTRONIC FRONTIER FOUNDATION  
454 Shotwell Street  
San Francisco, CA 94110

Telephone: (415) 436-9333  
Facsimile: (415) 436-9993

Attorneys for Plaintiff  
ELECTRONIC FRONTIER FOUNDATION

**DECLARATION PURSUANT TO GENERAL ORDER 45**

I, Jennifer Lynch, hereby declare pursuant to General Order 45 that I have obtained Defendants' concurrence in the filing of this document from Nicholas Cartier, Counsel for Defendants.

Executed on February 6, 2012, in San Francisco, California.

/s/ Jennifer Lynch  
Jennifer Lynch

\* \* \* \* \*

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 2/7/12

  
The Hon. RICHARD SEEBORG  
United States District Judge