1 2 3 4 5 6 7 8	TONY WEST Assistant Attorney General MELINDA HAAG United States Attorney ELIZABETH J. SHAPIRO Deputy Branch Director, Federal Programs Branch Civil Division NICHOLAS CARTIER, CA Bar #235858 Trial Attorney, Federal Programs Branch Civil Division 20 Massachusetts Ave NW, 7224 PO Box 883 (US Mail) Washington, DC 20530 Tel: 202-616-8351 Fax: 202-616-8470			
9 10	email: nicholas.cartier@usdoj.gov Attorneys for Defendant			
10	IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION			
12				
13	SAN FRANCISCO DIVISION			
14	ELECTRONIC FRONTIER FOUNDATION,) Case No. 10-CV-4892-RS			
15	Plaintiff,) STIPULATED REQUEST FOR ORDER			
16	TO CONTINUE ALL REMAINING			
17	DATES IN BRIEFING SCHEDULE FOR PARTIES' CROSS-MOTIONS			
18	DEPARTMENT OF JUSTICE,) FOR SUMMARY JUDGMENT BY) TWO WEEKS			
19	Defendant.) [CIV. L.R. 6-2]			
20) 			
21				
22	Pursuant to Fed. R. Civ. P. 6(b)(1) and Civil L.R. 6-2, the parties, by and through their			
23	undersigned counsel, have conferred and hereby stipulate to and respectfully request the Court			
24	grant a two-week extension of the current deadline for Defendant to file an Opposition to			
25	Plaintiff's Cross-Motion for Summary Judgment and Reply in support of its Motion for Summary			
26	Judgment and for Plaintiff to file a Reply in support of its Cross-Motion for Summary Judgment.			
2728	See 2/17/12 Order (ECF No. 36). The new schedule as proposed by the parties is as follows:			
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1 2	Defendant files an Opposition to Plaintiff for Summary Judgment and Reply in supp		
	its Motion for Summary Judgment		April 26, 2012
3 4	Plaintiff files a Reply in support of its Cross-Motion for Summary Judgment		May 17, 2010
5	Hearing on cross motions.		May 31, 2012
6 7	The requested changed will minimally affect the present schedule for the case because		
8	proposes continuing all dates, including the hearing date on the parties' cross motions for summary		
9	judgment, by two weeks. In accordance with Civil L.R. 6-2(a), this stipulation is supported by the		
10	Declaration of Nicholas Cartier, counsel for Defendant.		
11	The parties have previously stipulated to a briefing schedule (ECF No. 28) and to three		
12 13	adjustments to that briefing schedule, two to accommodate the Defendant (ECF Nos. 32 and 36)		
14	and the other to accommodate the Plaintiff (Dkt. 34). Defendant seeks the current two-week		
15	extension to allow its three components (Criminal Division, DEA and FBI) to complete work or		
16	supplemental declarations to address arguments raised in Plaintiff's Cross-Motion and Opposition		
17	In addition, FBI requires this additional time to make corrections to the annotations on some of the		
18	pages it produced to Plaintiff, which do not clearly indicate what exemption has been invoked with		
19	respect to certain redactions on the pages.		
20 21	The parties respectfully request that the schedule above be adopted in place of the schedule		
22	previously proposed.		
23	DATED: April 10, 2012	/s/ Nicholas Cartier NICHOLAS CARTIER, CA	A Bar #235858
24		Trial Attorney, Federal Prog Civil Division	
25		20 Massachusetts Ave NW, Washington, DC 20044	7224
26		Tel: 202-616-8351 Fax: 202-616-8470	
27		email: nicholas.cartier@usd Attorney for Defendant	oj.gov
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2	<u>CERTIFICATE OF SERVICE</u>
3	I hereby certify that on April 10, 2012, I caused a copy of the foregoing to be served on
4	Plaintiff via the Court's ECF system.
5	
6	/s/ Nicholas Cartier NICHOLAS CARTIER
7	
8	
9 10	GENERAL ORDER NO. 45(X) CERTIFICATION
11	I attest that I have obtained the concurrence of Jennifer Lynch, counsel for Plaintiff, in the
12	filing of this document.
13	/s/ Nicholas Cartier NICHOLAS CARTIER
14	NICHOLAS CARTIER
15	
16	PURSUANT TO STIPULATION, IT IS SO ORDERED.
17	Dated: 4/10/12
18	Dated: _4/10/12 Hon. Richard Seeborg
19	United States District Judge
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	10-CV- 4892-RS STIPULATION