1	TONY WEST	
 2 MELINDA HAAG United States Attorney 3 ELIZABETH J. SHAPIRO 		
	ELIZABETH J. SHAPIRO	
4	Deputy Branch Director, Federal Programs Branch Civil Division	
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9	email: nicholas.cartier@usdoj.gov Attorneys for Defendant	
10		
11	IN THE UNITED STATES DISTRICT COURT	
12	FOR THE NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION	
13		
14) ELECTRONIC FRONTIER FOUNDATION,) Case No. 10-CV-4892-RS	
15	Plaintiff,) · ORDER STIPULATED REQUEST FOR ORDER	
16	vs. VS.	
17) TERMINATING THIS ACTION	
18	DEPARTMENT OF JUSTICE,) [CIV. L.R. 6-2]	
19) Defendant.)	
20)	
21		
22	The Court has ordered the parties to submit a proposed judgment to terminate this action b	уy
23	December 2, 2013. Order Re Renewed Cross-Motions for Summary Judgment (ECF No. 75) at 10	0.
24	For the reasons discussed below, the parties have stipulated to and request a one-week extension of	of
25	this deadline until December 9, 2013.	
26	In response to the Court's Summary Judgment Order, the Criminal Division, Federa	പ
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28	Bureau of Investigation, and Drug Enforcement Administration (collectively, "DOJ Components"	´)
	10-CV- 4892-RS	

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1	processed and mailed out certain additional documents to Plaintiff on November 21, 2013. Id. The
2	materials were inadvertently sent to Plaintiff's prior address. As a result, counsel for Plaintiff has
3	not yet received the materials, and due to work-related travel, likely will not be able to review the
4 5	materials before the Thanksgiving holiday weekend. In addition, Government counsel has
6	preexisting international travel plans from November 28, 2013 through December 4, 2013.
7	Therefore, a one-week extension is needed to allow Plaintiff adequate time to review the DOJ
8	Components' productions and for the parties to meet and confer regarding a proposed judgment
9	terminating this action.
10	The requested changed will not affect any other dates in the present schedule.
11	
12	DATED: November 26, 2013 /s/ Nicholas Cartier
13	NICHOLAS CARTIER, CA Bar #235858 Trial Attorney, Federal Programs Branch
14	Civil Division 20 Massachusetts Ave NW, 7224
15	Washington, DC 20044 Tel: 202-616-8351
16	Fax: 202-616-8470 email: nicholas.cartier@usdoj.gov
17	Attorney for Defendant
18	
19	CERTIFICATE OF SERVICE
20	I hereby certify that on November 26, 2013, I caused a copy of the foregoing to be served
21	on Plaintiff via the Court's ECF system.
22	
23	/s/ Nicholas Cartier
24	NICHOLAS CARTIER
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	10-CV- 4892-RS STIPULATION

1	GENERAL ORDER NO. 45(X) CERTIFICATION
2	I attest that I have obtained the concurrence of Jennifer Lynch, counsel for Plaintiff, in the
3	filing of this document.
4	<u>/s/ Nicholas Cartier</u> NICHOLAS CARTIER
5	NICHOLAS CARTIER
6	
7	Pursuant to stipulation, the parties shall jointly file a proposed judgment terminating this
8	
9	action no later than December 9, 2013. SO ORDERED.
10 11	Dated: 11/26/13
11	Dated: <u>11/26/13</u> Hon. Richard Seeborg
12	United States District Judge
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28	10-CV-
	4892-RS STIPULATION