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7 Attorneys for Defendants

8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA

10	MARK ANTHONY DUNNE; AUDREY )	Case No. 3:10-cv-05636-EMC
11	GRACE FITZSIMMONS, )	
12	Plaintiffs, )	STIPULATION TO EXTEND DATES
13	vs. )	AND [ <del>PROPOSED</del> ] ORDER
14	DEPARTMENT OF HOMELAND )	
15	SECURITY; ATTORNEY GENERAL )	
16	ERIC H. HOLDER, JR.; IMMIGRATION )	
17	AND CUSTOMS ENFORCEMENT; )	
18	TIMOTHY S. AITKEN, )	
19	Defendants. )	

18 Plaintiffs, by and through his attorneys of record, and Defendants, by and through their  
19 attorneys of record, stipulate to the following:

- 20 1. Plaintiffs filed a complaint in this action on December 13, 2010. Plaintiffs perfected  
21 service on January 21, 2011. Defendants' original deadline to answer or respond was March 22,  
22 2011. This Court granted the parties' first extension until April 21, 2011.
- 23 2. The Defendants are still in the process of gathering information and documents, and  
24 determining their position on this case, and require additional time to complete these tasks before  
25 filing an answer or responsive pleadings.
- 26 3. Therefore, the parties hereby respectfully request this Court to order a twenty-one day  
27

28 STIPULATION FOR EXTENSION OF TIME  
 Case No. C 10-5636

1 extension of time within which the Defendants must serve their response in the above-entitled  
2 action. Defendants will file their response on or before May 12, 2011.

3  
4 Respectfully submitted,

5 Dated: April 15, 2011

s/ Katherine E.M. Goettel

6  
7 KATHERINE E.M. GOETTEL  
8 Trial Attorney  
9 United States Department of Justice  
10 Civil Division  
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17 E-mail: kate.goettel@usdoj.gov

18  
19 Dated: April 15, 2011

s/ James M. Byrne  
JAMES M. BYRNE

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26  
27 **ORDER**

28 Pursuant to stipulation, IT IS SO ORDERED.

29 Date: April 18, 2011



30 STIPULATION FOR EXTENSION OF TIME  
31 Case No. C 10-5636

1 **CERTIFICATE OF SERVICE**

2 **I hereby certify** that on April 15, 2011, I electronically filed the foregoing document  
3 with the Clerk of the Court using CM/ECF. I also certify this document is being served this day  
4 on all counsel of record or *pro se* parties identified on the attached Service List in the manner  
5 specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in  
6 some other authorized manner for those counsel or parties who are not authorized to receive  
7 electronic Notices of Electronic Filing.  
8

9 Dated: April 15, 2011

10 /s/ Katherine E.M. Goettel  
11 KATHERINE E.M. GOETTEL  
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