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11 *Jefferson, Assistant Secretary for*
Veterans Employment and Training;
12 *and U.S. Department of Labor*

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

16 INTERNATIONAL LONGSHORE AND)
WAREHOUSE UNION,)
17)
Plaintiff,)

18 v.)

19 HILDA SOLIS, Secretary of Labor;)
RAYMOND M. JEFFERSON, Assistant)
20 Secretary for Veterans Employment and)
Training; and U.S. DEPARTMENT OF)
21 LABOR,)
22)
Defendants.)

Case No. 3:11-cv-01939 (SI)
ORDER

**JOINT STIPULATION TO ENLARGE
TIME TO RESPOND TO PLAINTIFF'S
MOTION FOR PRELIMINARY
INJUNCTION**

23 On May 26, 2011 Plaintiff made a filing with this Court in which it moved for a
24 preliminary injunction. In that filing, Plaintiff noticed a hearing date for that motion of July 1,
25

26 Joint Stipulation to Enlarge Defendants' Time to Respond to Plaintiff's Motion for Preliminary Injunction
3:11-cv-01939 (SI)

1 2011. Pursuant to Local Civil Rule 7-3(a), Defendants' response to this motion must be filed by
2 Friday, June 10, 2011, and pursuant to Local Civil Rule 7-3(c), Plaintiff's Reply must be filed by
3 Friday, June 17, 2011. The parties hereby file a stipulation requesting (1) that the due date for
4 Defendants to file their response be changed to Tuesday, June 14, 2011 and (2) that the due date
5 for Plaintiff to file its Reply be changed to Tuesday, June 21, 2011. As required by Local Civil
6 Rule 6-2(a), the parties declare the following:

7 (1) The reason for the requested enlargement of time is the unavailability of
8 Defendants' counsel on the days leading up to the date on which the filing is
9 currently due. This case is being litigated on behalf of Defendants by attorneys at
10 the U.S. Department of Justice. The attorney with primary supervisory
11 responsibility over litigation of this case at the Department of Justice will be
12 absent from work for much of the week of June 6-10, 2011, and will therefore be
13 unable to work on this case. The primary attorney at the Department of Labor
14 responsible for assisting Department of Justice attorneys with this matter is also
15 unavailable for much of that week due to preexisting commitments on other
16 matters. Defendants ability to adequately respond to Plaintiff's Motion for
17 Preliminary Injunction will be compromised without the contributions of these
18 two attorneys.

19 (2) There have been no previous time modifications in this case.

20 (3) Under the current schedule of this case, any Reply by Plaintiff in support of its
21 motion would be due by June 17, 2011. So as not to reduce the amount of time
22 Plaintiff would be afforded to compose this filing, the parties request that the due
23 date of Plaintiff's Reply be changed to June 21, 2011. The parties request that the
24 hearing date remain set for July 1, 2011.

1 Dated: May 31, 2011

Respectfully submitted,

2 /s/ Eleanor Morton

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14 DATED: June 2, 2011

