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 5
    Attorney for Plaintiff
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 8
                       UNITED STATES DISTRICT COURT
 9
                 FOR THE NORTHERN DISTRICT OF CALIFORNIA
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    SETH ROSENFELD
                                        Case No. 3:11-cv-02131-MEJ
    Plaintiff,
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14
    VS.
                                        STIPULATION TO EXTEND DATE OF
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                                        INITIAL CASE MANAGEMENT
                                        CONFERENCE; AND [proposed]
16
    FEDERAL BUREAU OF
                                        ORDER
    INVESTIGATION and UNITED
17
    STATES DEPARTMENT OF JUSTICE,
18
    Defendants.
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        Plaintiff SETH ROSENFELD and Defendants FEDERAL BUREAU OF
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   INVESTIGATION and
                          UNITED
                                    STATES
                                             DEPARTMENT
                                                         OF
                                                                JUSTICE
25
    ("Stipulating Parties") stipulate through their respective
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   counsel as follows:
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                                     1
   Case No. 3:11-cv-02131-MEJ
   STIPULATION TO EXTEND DATE OF INITIAL CASE MANAGEMENT
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Rosenfeld v. Federal Bureau of Investigation et al

Doc. 8

Whereas, the Case Management Statement and Case Management Conference are scheduled for August 4, 2011 and August 11, 2011, respectively; and,

Whereas attorney for Plaintiff will be unable to attend Case Management Conference; and

Whereas there have been no previous time modifications in this case; and

Whereas delaying the Case Management Conference by 30 days will prejudice none of the Stipulating Parties;

THEREFORE, the Stipulating Parties stipulate and agree to request an extension of the Case Management Conference and Case Management Statement by 30 days and request the Court reschedule as the Case Management Conference at a time of its choosing. The Stipulating Parties propose September 1, 2011 or September 22, 2011 as acceptable alternative dates, with case management statement due seven (7) days prior.

| 1 | | |
|----------|---------------------|---|
| 2 | | |
| 3 | DATED: July 6, 2011 | Respectfully submitted, |
| 4 | | By: Berto |
| 5 | | Benjamin W Stein |
| 6 | | Attorney for Plaintiff SETH ROSENFELD |
| 7 | | SETH ROSENFELD |
| 8 | | By:/s/ Ila Deiss |
| 9 | | Ila C. Deiss |
| 10 | | Attorney for Defendants FEDERAL BUREAU OF INVESTIGATION |
| 11 | , | AND UNITED STATES DEPARTMENT OF JUSTICE |
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                                          Case No. 3:11-cv-02131-MEJ
12
    SETH ROSENFELD
    Plaintiff,
13
14
                                          [proposed] ORDER
    vs.
15
16
                                         Action Filed: July 6 2011
    FEDERAL BUREAU OF
    INVESTIGATION and UNITED
17
    STATES DEPARTMENT OF JUSTICE,
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    Defendants.
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[proposed] ORDER

| 1 | ORDER |
|----|--|
| 2 | By stipulation of the parties and good cause appearing |
| 3 | therefore, IT IS HEREBY ORDERED; |
| 4 | |
| 5 | Case management conference scheduled for August 11 |
| 6 | 2011 is rescheduled for September 22 , 2011 at |
| 7 | 10:00 a.m. with case management statement due seven |
| 8 | (7) days prior on September 15 , 2011. |
| 9 | |
| 10 | IT IS SO ORDERED. |
| 11 | |
| 12 | |
| 13 | Dated: July 7 2011 |
| 14 | |
| 15 | Chief Magistate Judge Maria-Elena James |
| 16 | rialla bicha dames |
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[proposed] ORDER