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Attorneys for Federal Defendant
United States Department of Commerce

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ELECTRONIC FRONTIER FOUNDATION,

Plaintiff,

v.

DEPARTMENT OF COMMERCE,

Defendant.

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) Case No. 3:12-cv-3683-TEH

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STIPULATION AND [PROPOSED]
ORDER ON BRIEF CONTINUANCE
OF SUMMARY JUDGMENT
HEARING DATE

Place: Courtroom 12, 19th Floor
 Judge: Hon. Thelton E. Henderson

1 Plaintiff Electronic Frontier Foundation (“EFF”) and Federal Defendant the United States
2 Department of Commerce hereby stipulate as follows and request that the Court order the same.

3 WHEREAS the hearing on the parties’ cross-motions for summary judgment is scheduled
4 for May 6, 2013 at 10:00 a.m.

5 WHEREAS Defendant’s counsel has fallen ill and has requested and Plaintiff’s counsel has
6 agreed to a one week continuance of the hearing on summary judgment, until May 13, 2013.

7 WHEREAS the parties agree and request that the Court continue the hearing on summary
8 judgment until May 13, 2013 at 10:00 a.m.

9
10 **SO STIPULATED.**

11 Respectfully submitted,

12 Dated: May 5, 2013

/s/ Mark Rumold
ELECTRONIC FRONTIER FOUNDATION
Attorney for Plaintiff

MELINDA HAAG
United States Attorney

16 Dated: May 5, 2013

/s/ Victoria R. Carradero
Assistant U.S. Attorney
Attorneys for Federal Defendant

18
19 **DECLARATION PURSUANT TO GENERAL ORDER 45**

20 I, Victoria R. Carradero, attest that I have obtained the concurrence of Mark Rumold,
21 Counsel for Plaintiff, in the filing of this document.

22 Executed on May 5, 2013, in San Francisco, California.

23 /s/ Victoria R. Carradero
Victoria R. Carradero

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

2 The hearing date for the parties' cross-motions for summary judgment is continued until
3 May 13, 2013.

4
5 DATE: May 6, 2013

