

1 Plaintiff Electronic Frontier Foundation and Defendant Department of Commerce
2 respectfully submit the following Stipulated Request and Proposed Order continuing the hearing
3 date on the parties' cross-motions for summary judgment until June 10, 2013. Good cause exists
4 for this Stipulated Request as follows:

5 1. The hearing on the parties' cross-motion was scheduled for May 6, 2013. Due to
6 illness of Defendant's counsel (ECF No. 29) and the Court's own continuance (ECF No. 32), the
7 hearing is currently scheduled for May 20, 2013.

8 2. Due to a previously scheduled conflict, Plaintiff's counsel is unavailable on May 20,
9 2013. May 27, 2013 is a federal holiday. Neither Plaintiff's nor Defendant's counsel are available
10 on June 3, 2013.

11 3. Therefore, the parties stipulate that the hearing date be continued until June 10,
12 2013.

13 4. Granting this Stipulated Request will not alter or extend any other dates or deadlines
14 currently pending in this matter.

15 WHEREFORE, the parties respectfully request that the Court grant this Stipulated Request
16 and continue the hearing date on the parties' cross-motions until June 10, 2013.

17 Respectfully submitted,

18 DATED: May 15, 2013

19 /s/ Mark Rumold
20 MARK RUMOLD
21 Electronic Frontier Foundation
22 815 Eddy Street
23 San Francisco, CA 94109
24 Telephone: (415) 436-9333
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26 *Counsel for Plaintiff*

27 DATED: May 15, 2013

28 MELINDA HAAG
United States Attorney
ALEX G. TSE
Chief, Civil Division
/s/ Victoria Carradero (with permission)
VICTORIA CARRADERO
Assistant United States Attorney
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Counsel for Defendant

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DECLARATION PURSUANT TO LOCAL RULE 5-1

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

Executed on May 15, 2013, in San Francisco, California.

/s/ Mark Rumold
Mark Rumold

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

The hearing date for the parties' cross-motions for summary judgment is continued until June 10, 2013.

DATED: 05/15/2013

