American Ci	il Liberties Union of Northern California et al v. Department of Justice			
1	UNITED STATES DISTRICT COURT			
2	NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION			
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4	AMERICAN CIVIL LIBERTIES UNION)No. 12-cv-4008-MEJOF NORTHERN CALIFORNIA;)			
	SAN FRANCISCO BAY GUARDIAN,			
5	Plaintiffs,			
6	v.) STIPULATION RE:			
7) CONTINUANCE OF HEARING DATE DEPARTMENT OF JUSTICE)			
8) Defendant.			
9				
10	The parties agree, subject to the Court's approval, to continue the hearing date in this			
11	matter, currently set for August 29, 2013, to September 5, 2013. Alternatively, the parties are			
12	available for a hearing on August 19, 20, 21, or 22, should the Court wish to schedule a hearing			
13	for one of those dates. In support thereof, the parties state as follows.			
14	1. The hearing that the parties seek to continue relates to their cross-motions for			
15	partial summary judgment regarding parts 2-4 of plaintiffs' FOIA request. See Dkt. Nos. 23, 25.			
16	2. The hearing date in this matter had originally been set for August 22. Based on			
17	that hearing date, undersigned counsel for the government had planned a family vacation for			
18	August 23 through and including September 2.			
19	3. On July 29, this Court entered an Order continuing the hearing date in this matter			
20	from August 22 to August 29. See Notice of Continuance, ECF No. 35, 07/29/2013.			
21	4. Because the new hearing date falls in the middle of government counsel's			
22	vacation, the parties request that the Court continue the August 29 hearing date to September 5.			
23	Alternatively, if the Court is unavailable to hear argument on the parties' cross-motions for			

partial summary judgment on September 5, the parties can be available for a hearing on the Court's original hearing date of August 22, or on August 19, 20, or 21.

STIPULATION RE: CONTINUANCE OF HEARING DATE Case No. 12-cv-4008-MEJ

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1	IT IS SO STIPULATED THIS 1ST DAY	OF AUGUST, 2013:
2	<u>/s/ Linda Lye</u> MICHAEL RISHER LINDA LYE	STUART F. DELERY Acting Assistant Attorney General Civil Division
3 4 5	American Civil Liberties Union Foundation of Northern California 39 Drumm Street San Francisco, CA 94111 Telephone: (415) 621-2493 Facsimile: (415) 255-8437	ELIZABETH J. SHAPIRO Deputy Branch Director Civil Division, Federal Programs Branch /s/ Brad P. Rosenberg
6 7 8	E-mail: <u>llye@aclunc.org</u> Attorneys for Plaintiffs	BRAD P. ROSENBERG (D.C. Bar No. 467513) Trial Attorney U.S. Department of Justice Civil Division, Federal Programs Branch P.O. Box 883
9 10		Washington, D.C. 20044 Telephone: (202) 514-3374 Facsimile: (202) 616-8460 E-mail: brad.rosenberg@usdoj.gov
11		Attorneys for Defendant
12 13	IT IS SO ORDERED that the hearing on th	ne parties' cross-motions for partial summary
13	judgment (Dkt. Nos. 23, 25), scheduled to	take place on August 29, 2013, is hereby continued to
15	09/05, 2013, at 10:00am in Courtroom B,	15th Floor, 450 Golden Gate Avenue, San Francisco,
16	California, 94102.	
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19		Judge Maria-Elena James
20		United States Magistrate Judge
21		August 1, 2013
22		Date
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	STIPULATION RE: CONTINUANCE OF HEARING I Case No. 12-cv-4008-MEJ	DATE

1	DECLARATION PURSUANT TO LOCAL RULE 5-1(i)(3)	
2	Pursuant to Local Rule $5-1(i)(3)$, the undersigned filer declares that concurrence in the	
3	filing of this document has been obtained from the other signatory to this document.	
4	I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st	
5	day of August, 2013.	
6	/s/ Brad P. Rosenberg	
7	BRAD P. ROSENBERG (D.C. Bar No. 467513) Trial Attorney U.S. Department of Justice	
8	Civil Division, Federal Programs Branch P.O. Box 883	
9	Washington, D.C. 20044 Telephone: (202) 514-3374	ļ
10	Facsimile: (202) 616-8460 E-mail: brad.rosenberg@usdoj.gov	
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	STIPULATION RE: CONTINUANCE OF HEARING DATE Case No. 12-cv-4008-MEJ	