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

18 MARY JENNINGS HEGAR, JENNIFER
 HUNT, ALEXANDRA ZOE BEDELL,
 19 COLLEEN FARRELL, AND SERVICE
 WOMEN'S ACTION NETWORK,

20 Plaintiffs,

21 vs.

22 ASHTON B. CARTER, Secretary of Defense,¹
 23 Defendant.

Case No. 12-CV-06005 EMC

**STIPULATED REQUEST AND
 [PROPOSED] ORDER FOR
 CONTINUANCE OF FURTHER CMC and
 UPDATED CMC STATEMENT**

Judge: Hon. Edward M. Chen

Case Management Conference: Oct. 8, 2015
 Time: 10:30 a.m.

27 ¹ Pursuant to Federal Rule of Civil Procedure 25(d), Ashton B. Carter has been substituted in his
 28 official capacity for Chuck Hagel as Secretary of Defense.

1 STIPULATION

2 Plaintiffs Mary Jennings Hegar, Jennifer Hunt, Alexandra Zoe Bedell, Colleen Farrell and
3 Service Women’s Action Network and Defendant Ashton B. Carter, Secretary of Defense
4 (“Secretary”) (collectively, “the parties”), by and through their respective counsel, submit this
5 Stipulated Request and Proposed Order for a continuance of the deadline for the parties’ updated
6 joint Case Management Conference (CMC) Statement to November 10, 2015, and further CMC to
7 November 19, 2015. The joint CMC Statement is currently due October 1, 2015, and the further
8 CMC is currently scheduled for October 8, 2015. Defendant submits that the following facts and
9 circumstances set forth in the attached Declaration of counsel for Defendant Caroline Lewis
10 Wolverton establish good cause for the requested continuance as follows:

11 1. On July 30, 2015, the Court scheduled a further CMC in this matter for October 8,
12 2015, and ordered the parties to meet and confer regarding Defendants’ accession, assignment and
13 training procedures and policies and thereafter provide an updated joint CMC Statement by
14 October 1, 2015. ECF No. 60 (Aug. 4, 2015).

15 2. September 30, 2015 is the deadline for the Military Departments and U.S. Special
16 Operations Command to present final recommendations on remaining closed occupations and
17 positions to the Secretary of Defense. That date is also the deadline for each Military Department
18 Secretary to certify that all occupational standards in his/her Department are gender-neutral and in
19 compliance with all applicable public laws.

20 3. Defendant expects that the work during the weeks prior to September 30, 2015
21 associated with finalizing recommendations on remaining closed positions and ensuring that all
22 occupational standards are gender-neutral and in compliance with all applicable public laws will
23 be substantial.

24 4. Defendant believes that simultaneously completing the ordered meet-and-confer in
25 order to present a joint CMC statement by October 1, 2015, and if appropriate an accompanying
26 declaration, would strain the resources that the military must devote to the work of finalizing
27 recommendations on remaining closed positions and ensuring that all occupational standards are
28 gender-neutral and in compliance with all applicable public laws.

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4 **ATTESTATION PURSUANT TO GENERAL ORDER 45**

5 I, Caroline Lewis Wolverson, am the ECF User whose identification and password are
6 being used to file this Stipulated Request and [Proposed] Order for Continuance of Further Case
7 Management Conference and Updated Case Management Statement. In compliance with General
8 Order 45.X.B, I hereby attest that all signatories have concurred in this filing.

9
10 /s/ Caroline Lewis Wolverson

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~~[PROPOSED]~~ ORDER

Pursuant to the stipulated request, and based on good cause shown, it is hereby ORDERED that the Stipulated Request for Continuance of Further Case Management Conference and Updated Case Management Statement is hereby GRANTED; and it is further ORDERED that the Further Case Management Conference is hereby CONTINUED to November 19, 2015; and it is further ORDERED that the deadline for the parties' Updated Joint CMC Statement is CONTINUED to November 10, 2015.

Dated: 9/14/15

