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Attorneys for Defendant JAMES N. MATTIS

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 JAMES N. MATTIS<sup>1</sup>, Secretary of Defense,  
 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: Jul. 13, 2017  
Time: 10:30 a.m.

27 <sup>1</sup> Pursuant to Federal Rule of Civil Procedure 25(d), James N. Mattis has been substituted in his  
 28 official capacity for Ash Carter 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 James N. Mattis, 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 Case Management Conference  
6 (CMC) scheduled for July 13, 2017, and deadline for the parties’ updated joint CMC Statement,  
7 which is currently due July 6, 2017. Defendant respectfully requests a continuance of the CMC to  
8 September 21, 2017, and the deadline for the parties’ updated joint CMC Statement to September  
9 14, 2017, and the Plaintiffs stipulate to such request. Defendant submits that the facts and  
10 circumstances set forth in the attached Declaration of counsel for Defendant establish good cause  
11 for the requested continuance as follows:

12 1. On January 12, 2017, the Court scheduled the further CMC in this matter for July 13,  
13 2017, and ordered the parties to provide an updated joint CMC Statement by July 6, 2017. ECF  
14 No. 91.

15 2. Subsequently, Defendant’s prior counsel, Ms. Caroline Wolverton left the Department  
16 of Justice and Defendant’s current counsel, Mr. Andrew Carmichael, was assigned this case on  
17 June 8, 2017.

18 3. Mr. Carmichael has previously scheduled leave plans from July 7, 2017 through  
19 July 14, 2017.

20 4. The current date of the CMC falls during Mr. Carmichael’s previously scheduled leave.

21 5. Additionally, Mr. Carmichael has substantial briefs due in two other cases in late  
22 June and mid-July and as newly appointed counsel needs time to familiarize himself with the  
23 present litigation.

24 6. Plaintiffs’ counsel would have a conflict with the CMC being rescheduled during the  
25 month of August due to her getting married and traveling on her honeymoon.

26 7. In light of the foregoing, Defendant respectfully requests that the Court continue the  
27 Case Management Conference to September 21, 2017, and the deadline for the parties’ updated  
28 joint CMC Statement to September 14, 2017.

1 DATED: June 30, 2017

CHAD A. READLER  
Acting Assistant Attorney General  
ANTHONY J. COPPOLINO  
Deputy Branch Director

2  
3  
4 /s/ Andrew E. Carmichael  
5 ANDREW E. CARMICHAEL  
6 U.S. Department of Justice  
7 Attorneys for Defendant JAMES N. MATTIS

8 DATED: June 30, 2017

MUNGER, TOLLES & OLSON LLP

9  
10 By: /s/ Rosemarie T. Ring  
ROSEMARIE T. RING

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12 MARY JENNINGS HEGAR, JENNIFER HUNT,  
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**ATTESTATION PURSUANT TO GENERAL ORDER 45**

I, Andrew E. Carmichael, am the ECF User whose identification and password are being used to file this Stipulated Request and [Proposed] Order for Continuance of Further Case Management Conference and updated Case Management Statement. In compliance with General Order 45.X.B, I hereby attest that all signatories have concurred in this filing.

/s/ Andrew E. Carmichael

**~~[PROPOSED]~~ ORDER**

Pursuant to stipulation, it is SO ORDERED.

Dated: 7/5/17

