DECLARATION OF KATHLEEN LU

Case No.: 3:13-cv-00815 SC

- I, Kathleen Lu, declare pursuant to 28 U.S.C. § 1746 as follows:
- 1. I am an attorney licensed to practice in California and before this Court. I am an associate with Fenwick & West LLP, and counsel for Plaintiff Public.Resource.Org ("Public Resource") in this matter. I have personal knowledge of the matters set forth below, and if called to testify, I could and would competently do so.
- 2. On May 29, 2013, Public Resource filed its motion for default judgment (Dkt. No. 23), noticing a hearing date of July 19th, 2013.
- 3. The Parties stipulated to, and the Court granted, an extension of time to June 27, 2013, for Public Resource to file its reply and any supporting papers.
- 4. Since then, the Parties have discussed settlement and believe a settlement is possible. The Parties also believe that additional time would greatly aid the Parties in negotiating and finalizing any settlement. The Parties believe that an extension of time for Public Resource's reply and any supporting papers to July 11, 2013 and re-calendaring of the hearing date to July 26, 2013, or a later date convenient for the Court, will provide the parties time to finalize such a settlement.
- 5. This is the second modification of time request in this case, and will not have any effect on the schedule for the case except for the change in hearing date.

I declare under penalty of perjury under the laws of United States that the foregoing is true and correct.

Executed this  $24^{\text{th}}$  day of June, 2013 at San Francisco, California.

/s/ Kathleen Lu	
Kathleen Lu	