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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

E.J. ET AL,

Plaintiffs,

v.

UNITED STATES OF AMERICA ET AL,
Defendants.

Case No. C 13-1923 NC

**STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE DEADLINES
FOR THE UNITED STATES TO
RESPOND TO PLAINTIFFS'
COMPLAINT, CASE MANAGEMENT
ACTIVITIES SET FORTH IN CASE
MANAGEMENT ORDER, AND CASE
MANAGEMENT CONFERENCE
AS MODIFIED**

1 Federal Defendants the United States of America ("USA") and the United States Coast
2 Guard and Plaintiffs E.J., a minor, Lisa Houlihan Johnson and Donald Arthur Johnson
3 ("Planitiffs"), by and through their undersigned attorneys, hereby stipulate as follows:

4 WHEREAS the deadline for the United States of America to respond to Plaintiffs'
5 Complaint is July 15, 2013 and the USA has requested additional time; and

6 WHEREAS the parties request more time to complete the case management activities set
7 forth in the Order Setting Initial Case Management Conference and ADR Deadlines at Docket
8 No. 2.

9
10 The parties hereby agree and request that the Court order that:

11 The deadline for the USA to respond to Plaintiffs' Complaint is continued from July 15,
12 2013 until August 1, 2013.

13 The deadline for the parties to complete the initial case management activities set forth in
14 the Order Setting Initial Case Management Conference and ADR Deadlines, Docket No. 2, is
15 continued to August 7, 2013.

16
17 The parties will mutually agree to the date for the exchange of initial disclosures as part
18 of meeting and conferring on the contents of the Case Management Conference Statement, which
19 will be filed on August 7, 2013.

20 The Case Management Conference will be continued from July 25, 2013 to August 21,
21 2013 at 10:00 a.m.

1 **SO STIPULATED.**

2 Respectfully submitted,

3 CASPER, MEADOWS, SCHWARTZ & COOK

4
5 Dated: July 11, 2013

6 Electronic Signature Authorized /S/
7 Andrew Charles Schwartz,
8 Counsel for Plaintiffs E.J., a minor, Lisa Houlihan
9 Johnson, and Donald Arthur Johnson

10
11 MELINDA HAAG
12 United States Attorney

13
14 Dated: July 10, 2013

15 Electronic Signature Authorized /S/
16 Victoria R. Carradero,
17 Counsel for the United States of America and Coast
18 Guard

19
20 **DECLARATION PURSUANT TO GENERAL ORDER 45**

21 I, Victoria R. Carradero, attest that I have obtained the concurrence of Andrew Charles
22 Schwarz, Counsel for Plaintiffs, in the filing of this document.

23 Executed on July 11, 2013, in San Francisco, California.

24 /s/ Victoria R. Carradero
25 Victoria R. Carradero

PURSUANT TO STIPULATION, IT IS SO ORDERED.

The deadline for the USA to respond to Plaintiffs' Complaint is continued from July 15, 2013 until August 1, 2013.

The deadline for the parties to complete the initial case management activities set forth in the Order Setting Initial Case Management Conference and ADR Deadlines, Docket No. 2, is continued to August 7, 2013.

The parties will mutually agree to the date for the exchange of initial disclosures as part of meeting and conferring on the contents of the Case Management Conference Statement, which will be filed on August 7, 2013.

The Case Management Conference will be continued from July 25, 2013 to August 21, 2013 at ~~10:00 a.m.~~ at 3:00 p.m.

Dated: July 11, 2013

