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16 Attorneys for Defendant United States Internal Revenue Service

17
 18 IN THE UNITED STATES DISTRICT COURT
 19 THE NORTHERN DISTRICT OF CALIFORNIA
 20 SAN FRANCISCO DIVISION

21 PUBLIC.RESOURCE.ORG., a California non-)	Case No. 13-cv-02789 WHO
profit organization,)	
)	STIPULATION AND [PROPOSED]
22 Plaintiff,)	ORDER RESCHEDULING HEARING
)	ON DEFENDANT'S MOTION TO
23 v.)	DISMISS AND INITIAL CASE
)	MANAGEMENT CONFERENCE
24 UNITED STATES INTERNAL REVENUE)	
SERVICE,)	
)	
25 Defendant.)	
_____)	

27 The parties, through their respective counsel of record, submit the following stipulation
 28 and request that the Court issue an order as requested:

1 WHEREAS, on September 3, 2013, defendant United States Internal Revenue Service
2 (“IRS”) filed a Motion to Dismiss (“the Motion”);

3 WHEREAS, the Motion is scheduled for hearing on December 18, 2013;

4 WHEREAS, the Initial Case Management Conference in this matter is also scheduled for
5 December 18, 2013;

6 WHEREAS, on November 15, 2013, the parties participated in an ADR Phone Conference
7 with the Court’s ADR Program Director pursuant to Civil Local Rule 16-8 and ADR Local Rule
8 3-5, and the parties agreed to participate in an ADR mediation session with a Court-appointed
9 mediator on or before February 11, 2014;

10 WHEREAS, the parties believe that the mediation session may help resolve their dispute,
11 and therefore it would be more efficient for the Court and the parties to continue the hearing on the
12 IRS’ Motion and the Initial Case Management Conference until after the mediation session;

13 NOW THEREFORE, IT IS HEREBY STIPULATED THAT:

14 The hearing on the Motion to Dismiss and the Initial Case Management Conference
15 scheduled for December 18, 2013, are vacated and will be rescheduled by the Court to a date after
16 the parties participate in an ADR mediation session, which session shall take place on or before
17 February 11, 2013.

18 IT IS SO STIPULATED.

19 DATED this 27th day of November, 2013.

DAVIS WRIGHT TREMAINE LLP

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26 By: /s/ Yonatan Gelblum
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By: /s/ Thomas R. Burke
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ATTESTATION PURSUANT TO GENERAL ORDER 45

I, Thomas R. Burke, hereby attest that concurrences in the filing of this document have been obtained from each of the signatories.

/s/ Thomas R. Burke
Thomas R. Burke

[PROPOSED] ORDER

Pursuant to the parties' stipulation, and good cause appearing, the foregoing is approved and IT IS SO ORDERED.

Date: _____
United States District Court Judge