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18 Attorneys for Defendant United States Internal Revenue Service

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

22 PUBLIC.RESOURCE.ORG., a California non-)
 23 profit organization,)
 24 Plaintiff,)
 25 v.)
 26 UNITED STATES INTERNAL REVENUE)
 27 SERVICE,)
 28 Defendant.)

Case No. 13-cv-02789 WHO

PROPOSED BRIEFING SCHEDULE

1 Plaintiff Public.Resource.Org, Inc. and Defendant United States Internal Revenue Service
2 respectfully submit the following proposed briefing schedules. Because the Court has reserved
3 judgment on whether to permit discovery until the parties provide a joint letter on the issue after
4 the filing of Defendant’s opening brief, two alternate schedules are proposed.

5 **If the Court does not permit discovery:**
6 Motion for Summary Judgment by
7 Defendant shall be due **August 6, 2014;**
8 Opposition and any Cross-Motion by
9 Plaintiff shall be due **September 22, 2014;**
10 Reply and Opposition by Defendant, if
11 applicable, shall be due **October 22, 2014;**
12 Reply by Plaintiff, if applicable, shall be due
13 **November 21, 2014.**

If the Court permits discovery:
Motion for Summary Judgment by
Defendant shall be due **August 6, 2014;**
Opposition and any Cross-Motion by
Plaintiff shall be due **October 10, 2014;**
Reply and Opposition by Defendant, if
applicable, shall be due **December 10, 2014;**
Reply by Plaintiff, if applicable, shall be due
January 12, 2015

14
15 DATED this 2nd day of July, 2014.

16 MELINDA HAAG
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DAVIS WRIGHT TREMAINE LLP

By: /s/ Thomas R. Burke
THOMAS R. BURKE
Attorneys for Plaintiff Public.Resource.Org

20 By: /s/ Yonatan Gelblum
21 YONATAN GELBLUM
22 Attorneys for Defendant United States
Internal Revenue Service

23 **ATTESTATION PURSUANT TO GENERAL ORDER 45**

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

26 /s/ Thomas R. Burke
27 Thomas R. Burke