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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-)	Case No. 13-cv-02789 WHO
23 profit organization,)	
)	STIPULATION AND [PROPOSED]
24 Plaintiff,)	ORDER EXTENDING PLAINTIFF'S
)	TIME TO MOVE TO RECOVER
25 v.)	ATTORNEYS' FEES AND COSTS
)	
26 UNITED STATES INTERNAL REVENUE)	
SERVICE,)	
)	
27 Defendant.)	
)	

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

3 WHEREAS, on January 29, 2015, this Court granted the Motion for Summary Judgment
4 of Plaintiff Public.Resource.Org, denied the Motion for Summary Judgment of Defendant United
5 States Internal Revenue Service, and entered Judgment in favor of Plaintiff;

6 WHEREAS, Plaintiff intends to move to recover attorneys' fees and costs pursuant to 5
7 U.S.C. § 552(a)(4)(E);

8 WHEREAS, under Federal Rule of Civil Procedure 54(d) and Northern District Local Rule
9 54-5, Plaintiff's Fee Motion is currently due by February 12, 2015;

10 WHEREAS, the parties agree that an extension of Plaintiff's deadline to file a Fee Motion
11 might help to facilitate a resolution of the fee issue that would not require a motion;

12 NOW THEREFORE, IT IS HEREBY STIPULATED THAT:

- 13 1. Plaintiff's deadline to file a motion to recover attorneys' fees and costs shall be
14 extended until March 16, 2015.

15 IT IS SO STIPULATED.

16 DATED this 9th day of February, 2015.

DAVIS WRIGHT TREMAINE LLP

17 MELINDA HAAG
18 United States Attorney
19 CAROLINE D. CIRAULO
Principal Deputy Assistant Attorney General,
Tax Division

By: /s/ Thomas R. Burke
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20 CHRISTOPHER W. SANDERS
21 Trial Attorney, Tax Division
By: /s/ Christopher W. Sanders
22 CHRISTOPHER W. SANDERS
23 Attorneys for Defendant United States Internal
Revenue Service

24 **ATTESTATION PURSUANT TO GENERAL ORDER 45**

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

27 /s/ Thomas R. Burke
28 Thomas R. Burke

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[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