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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,	)	
	)	<b>STIPULATION AND ORDER</b>
24 Plaintiff,	)	<b>EXTENDING PLAINTIFF'S TIME TO</b>
	)	<b>MOVE TO RECOVER ATTORNEYS'</b>
25 v.	)	<b>FEES AND COSTS</b>
	)	
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 \_\_th day of February, 2015.

DAVIS WRIGHT TREMAINE LLP

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

By: /s/ Thomas R. Burke  
THOMAS R. BURKE  
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21 CHRISTOPHER W. SANDERS  
Trial Attorney, Tax Division  
22 By: /s/ Christopher W. Sanders  
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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**ORDER**

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

Date: February 10, 2015

  
United States District Court Judge