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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,)	
)	SECOND STIPULATION AND
24 Plaintiff,)	[PROPOSED] ORDER EXTENDING
)	PLAINTIFF'S TIME TO MOVE TO
25 v.)	RECOVER 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, on February 10, 2015, this Court entered an order extending Plaintiff's
9 deadline to bring a Fee Motion until March 16, 2015, pursuant to a stipulation of the parties;

10 WHEREAS, the parties are still working to resolve the fee issue, and agree that an
11 additional 30-day extension of Plaintiff's deadline to file a Fee Motion might help to facilitate a
12 resolution without burdening the Court or parties with a motion;

13 NOW THEREFORE, IT IS HEREBY STIPULATED THAT:

- 14 1. Plaintiff's deadline to file a motion to recover attorneys' fees and costs shall be
15 extended until April 15, 2015.

16 IT IS SO STIPULATED.

17
18 DATED this 6th day of March, 2015.

19 MELINDA HAAG
20 United States Attorney
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21 Principal Deputy Assistant Attorney General,
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22 CHRISTOPHER W. SANDERS
23 Trial Attorney, Tax Division
By: /s/ Christopher W. Sanders
24 CHRISTOPHER W. SANDERS
25 Attorneys for Defendant United States Internal
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By: /s/ Thomas R. Burke
THOMAS R. BURKE
Attorneys for Plaintiff Public.Resource.Org

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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