

1 THOMAS R. BURKE (CA State Bar No. 141930)  
RONALD G. LONDON (Pro Hac Vice)  
2 DAVIS WRIGHT TREMAINE LLP  
505 Montgomery Street, Suite 800  
San Francisco, California 94111  
3 Phone: (415) 276-6500/Fax: (415) 276-6599  
Email: thomasburke@dwt.com  
4

5 DAN LAIDMAN (CA State Bar No. 274482)  
DAVIS WRIGHT TREMAINE LLP  
865 South Figueroa Street, Suite 2400  
6 Los Angeles, CA 90017-2566  
Phone: (213) 633-6800/Fax: (213) 633-6899  
7 Email: danlaidman@dwt.com

8 DAVID HALPERIN (Pro Hac Vice)  
1530 P Street NW  
9 Washington, DC 20005  
Telephone: (202) 905-3434  
10 Email: davidhalperindc@gmail.com

11 Attorneys for Plaintiff Public.Resource.Org

12 MELINDA HAAG  
United States Attorney  
13 CAROLINE D. CIRAULO  
Principal Deputy Assistant Attorney General, Tax Division  
14 CHRISTOPHER W. SANDERS  
Trial Attorneys, Tax Division, U.S. Department of Justice  
15 Post Office Box 227, Ben Franklin Station  
Washington, D.C. 20044  
16 Phone: (202) 616-1840/Fax: (202) 514-6866  
Email: Christopher.W.Sanders@usdoj.gov  
17

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  
profit organization, )  
23 ) **SECOND STIPULATION AND ORDER**  
Plaintiff, ) **EXTENDING PLAINTIFF'S TIME TO**  
24 ) **MOVE TO RECOVER ATTORNEYS'**  
v. ) **FEES AND COSTS**  
25 )  
UNITED STATES INTERNAL REVENUE )  
26 SERVICE, )  
27 Defendant. )  
28 \_\_\_\_\_ )

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  
CAROLINE D. CIRAULO  
21 Principal Deputy Assistant Attorney General,  
Tax Division  
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  
Revenue Service

DAVIS WRIGHT TREMAINE LLP

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

**ORDER**

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

Date: March 9, 2015

  
United States District Court Judge