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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
profit organization,)	
)	STIPULATION AND [PROPOSED]
23 Plaintiff,)	ORDER EXTENDING DEFENDANT'S
)	DEADLINE FOR PRODUCTION OF
24 v.)	DOCUMENTS AND PLAINTIFF'S
)	DEADLINE TO MOVE TO RECOVER
25 UNITED STATES INTERNAL REVENUE)	ATTORNEYS' FEES AND COSTS
SERVICE,)	
)	
26 Defendant.)	
27 _____)	

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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, the Plaintiff's Fee Motion is currently due by May 5, 2015;

9 WHEREAS, the parties agree that an extension of Plaintiff's deadline to file a Fee Motion
10 will allow the parties additional time to confer and consider attorneys' fees and costs issues that
11 could lead to narrowing issues to be presented in a future motion for fees and costs, or to
12 eliminating the need to file such a motion;

13 NOW THEREFORE, IT IS HEREBY STIPULATED THAT:

14 Plaintiff's deadline to file a motion to recover attorneys' fees and costs shall be
15 extended until June 5, 2015.

16 IT IS SO STIPULATED.

17 DATED this 22nd day of April, 2015.

DAVIS WRIGHT TREMAINE LLP

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

By: /s/ Thomas R. Burke
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ATTESTATION PURSUANT TO GENERAL ORDER 45

I, Christopher W. Sanders, hereby attest that concurrences in the filing of this document have been obtained from each of the signatories.

/s/ Christopher W. Sanders _____
Christopher W. Sanders

[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