

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

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

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

Attorneys for Plaintiff Public.Resource.Org

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

Attorneys for Defendant United States Internal Revenue Service

IN THE UNITED STATES DISTRICT COURT
 THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

PUBLIC.RESOURCE.ORG., a California non-)	Case No. 13-cv-02789 WHO
profit organization,)	
)	STIPULATION AND ORDER
Plaintiff,)	EXTENDING PLAINTIFF'S DEADLINE
)	TO MOVE TO RECOVER ATTORNEYS'
v.)	FEES AND COSTS
)	
UNITED STATES INTERNAL REVENUE)	
SERVICE,)	
)	
Defendant.)	

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
THOMAS R. BURKE
Attorneys for Plaintiff Public.Resource.Org

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

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/s/ Christopher W. Sanders

Christopher W. Sanders

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

W. A. De
United States District Court Judge