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11	IN THE UNITED STATES DISTRICT COURT		
12	FOR THE NORTHERN D	DISTRICT OF CALIFORNIA	
13	SAN FRANC	ISCO DIVISION	
14)	
15	ELECTRONIC FRONTIER FOUNDATION,	Case No.: 14-cv-03010-RS	
16	Plaintiff,) STIPULATION AND [PROPOSED	
17	V.	ORDER] TO EXTEND BY FOUR BUSINESS DAYS DEFENDANTS'	
18	NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL		
19	INTELLIGENCE,	JUDGMENT MOTION AND THEIR OPPOSITION TO PLAINTIFF'S	
20		CROSS-MOTION FOR SUMMARY JUDGMENT	
21	Defendants.) Hon. Richard Seeborg	
22)	
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28	STIPULATION AND [PROPOSED ORDER] TO EXTEND BY FOUR BUSINESS DAYS DEFENDANTS' DEADLINE TO FILE THEIR REPLY IN SUPPORT OF THEIR SUMMARY JUDGMENT MOTION AND THEIR OPPOSITION TO PLAINTIFF'S CROSS-MOTION FOR SUMMARY JUDGMENT Case No.: 14-cv-03010-RS		
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1	Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Local Civil Rule 6-2,		
2	Defendants request and the parties, by and through undersigned counsel, have conferred and		
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4	hereby stipulate to and respectfully request that (1) the Court extend the deadline by four business		
5	days to January 14 for Defendants to file their combined opposition to plaintiff's cross-motion for		
6	summary judgment and their reply in support of their motion for summary judgment; (2) the Court		
7	correspondingly extend by four business days to January 28 the deadline for Plaintiff's reply in		
8	support of its cross-motion for summary judgment; and (3) that the Court retain the February 18,		
9	2016 hearing on these motions as currently calendared.		
10	Defendants provide the following bases in support of their request:		
10	1. On September 25, 2015, the parties submitted a stipulated request to set a briefing		
11	schedule for filing cross-motions for summary judgment. See ECF No. 30.		
	2. Thereafter, the Court adopted the parties' proposed schedule and set the following		
13	dates for briefing:		
14	a. On or before October 30, 2015, defendants will file their motion for		
15	summary judgment.		
16	b. On or before December 4, 2015, plaintiff will file its combined cross-motion		
17	for summary judgment and opposition to defendants' motion.		
18	c. On or before January 8, 2016, defendants will file their combined opposition		
19	to plaintiff's motion and reply in support of their motion.		
20	d. On or before January 22, 2016, plaintiff will file its reply in support of its		
21	motion.		
22	<i>See</i> ECF No. 31.		
23	3. Pursuant to this briefing schedule, Defendants filed their summary judgment motion		
24	on October 30, and Plaintiff filed its cross-motion for summary judgment and opposition to		
25	Defendants' motion on December 4, 2015. <i>See</i> ECF Nos. 32, 34.		
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	STIPULATION AND [PROPOSED ORDER] TO EXTEND BY FOUR BUSINESS DAYS DEFENDANTS' DEADLINE TO FILE THEIR REPLY IN SUPPORT OF THEIR SUMMARY JUDGMENT MOTION AND THEIR OPPOSITION TO PLAINTIFF'S CROSS-MOTION FOR SUMMARY JUDGMENT Case No.: 14-cv-03010-RS		

1	4. Defendants need a four business-day extension of their current deadline from
2	January 8 to January 14 to complete their combined opposition to plaintiff's motion and reply in
3	support of their motion. Specifically, Defendants need this additional time to allow the equity
4	holders in the document at issue to consider the extent to which redactions in the document may be
5	lifted. That process was hampered by the unavailability of various officials during the recent
6	holiday period and made more difficult by the undersigned counsel's work on several other briefs
7	in other cases in December and in early January.
8	5. Defendants also seek a concomitant four business-day extension for Plaintiff's
9	current deadline for its reply in support of its motion for summary judgment from January 22 to
10	January 28.
11	6. Both parties request that the hearing date for these cross-motions remain on
12	February 18, 2016.
13	DATED: January 6, 2015 Respectfully submitted,
14	
15	BENJAMIN C. MIZER Principal Deputy Assistant Attorney General
16	MELINDA HAAG United States Attorney
17	ELIZABETH J. SHAPIRO
18	Deputy Branch Director
19	/s/ Rodney Patton RODNEY PATTON
20	JULIA A. BERMAN
21	United States Department of Justice Civil Division, Federal Programs Branch
22	20 Massachusetts Avenue, N.W. Washington, D.C. 20001
23	Telephone: (202) 305-7919 Facsimile: (202) 616-8470
24	Attorneys for Defendant
25	nitorneys for Defendant
26	
27	
28	2 Stipulation and [Proposed Order] to Extend By Four Business Days Defendants' Deadline to File Their Reply in Support of Their Summary Judgment Motion and
	THEIR OPPOSITION TO PLAINTIFF'S CROSS-MOTION FOR SUMMARY JUDGMENT Case No.: 14-cv-03010-RS

1	/s/ Andrew Crocker	
2	Andrew Crocker Mark Rumold	
3	Nathan Cardozo	
4	Jennifer Lynch ELECTRONIC FRONTIER FOUNDATION	
5	815 Eddy St. San Francisco, CA 94109	
6		
7	Attorneys for Plaintiff Electronic Frontier Foundation	
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11	ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)	
12	I, Rodney Patton, hereby attest that I obtained the concurrence of Andrew Crocker, counsel	
12	for the Plaintiff, Electronic Frontier Foundation, in the filing of this document.	
13	/s/ Rodney Patton	
15	RODNEY PATTON	
15	Senior Counsel United States Department of Justice	
10	Civil Division, Federal Programs Branch 20 Massachusetts Avenue, N.W.	
17	Washington, D.C. 20001	
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28	3 Stipulation and [Proposed Order] to Extend By Four Business Days Defendants' Deadline to File Their Reply in Support of Their Summary Judgment Motion and	
	THEIR OPPOSITION TO PLAINTIFF'S CROSS-MOTION FOR SUMMARY JUDGMENT Case No.: 14-cv-03010-RS	

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1	PURSUANT TO STIPULATION, it is hereby ORDERED that		
2	1. The current deadline of January 8 for Defendants to file their combined opposition to		
3	Plaintiff's motion and reply in support of their motion is hereby extended by four		
4	business days and is now due on January 14, 2016.		
5	2. The current deadline of January 22 for Plaintiff to file its reply in support of its motion		
6	for summary judgment is hereby extended by four business days to January 28, 2016.		
7	3. The current hearing date for these cross-motions remains as currently scheduled on		
8	February 18, 2016.		
9	AND IT IS SO ORDERED.		
10	With Machine		
11	Dated: <u>1/7/16</u> HON. RICHARD SEEBORG		
12	UNITED STATES DISTRICT JUDGE		
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28	4 STIDUL ATION AND [DRODOGED ODDED] TO EXTEND BY FOUD BUGDIEGG DAVG DEFENDANTS'		
	STIPULATION AND [PROPOSED ORDER] TO EXTEND BY FOUR BUSINESS DAYS DEFENDANTS' DEADLINE TO FILE THEIR REPLY IN SUPPORT OF THEIR SUMMARY JUDGMENT MOTION AND THEIR OPPOSITION TO PLAINTIFF'S CROSS-MOTION FOR SUMMARY JUDGMENT Case No.: 14-cv-03010-RS		