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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ALAN STEIN,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
COMMERCE,

Defendant.

) CASE NO. 15-03510 JST

) ~~JOINT STIPULATION AND [PROPOSED] ORDER~~
) TO STAY PROCEEDINGS

STIPULATION TO STAY PROCEEDINGS
15-03510 JST

1 Pursuant to Local Rule 6-2(a), Plaintiff Alan Stein (“Plaintiff”) and Defendant United States
2 Department of Commerce (“Defendant”) hereby stipulate and agree, subject to the approval of the
3 Court, that:

4 1. Plaintiff’s Complaint identifies 12 FOIA Requests that are the subject of this litigation.

5 2. Defendant has completed its response with respect to Plaintiff’s FOIA Requests bearing
6 the tracking numbers: DOC-NOAA-2015-000597, DOC-NOAA-2015-000693; DOC-NOAA-2015-
7 000694; DOC-OIG-2015-000716 and DOC-OIG-2015-000753. Plaintiff will determine if he believes
8 there are any remaining issues with such responses and will meet and confer with Defendant regarding
9 same.

10 3. Based on the information available to date, Defendant will make its best efforts to
11 complete its response to Plaintiff’s FOIA Requests bearing the tracking numbers DOC-NOAA-2015-
12 000595, DOC-NOAA-2015-000596, DOC-NOAA-2015-000 606 and DOC-NOAA-2015-000747 by
13 October 22, 2015.

14 4. Based on the information available to date, Defendant intends to determine by October
15 22, 2015 if it has documents responsive to Plaintiff’s FOIA request bearing the tracking number DOC-
16 NOAA-2015-000144, after which time, if applicable, Defendant will provide a release date for such
17 documents.

18 5. Based on the information available to date, Defendant will make its best efforts to make
19 an initial production in response to Plaintiff’s FOIA Request bearing the tracking number DOC-NOAA-
20 2013-000138, likely to be followed by additional rolling productions at a later date, and to complete its
21 response to Plaintiff’s FOIA Request bearing the tracking number DOC-NOAA-2013-000139 by
22 November 23, 2015.

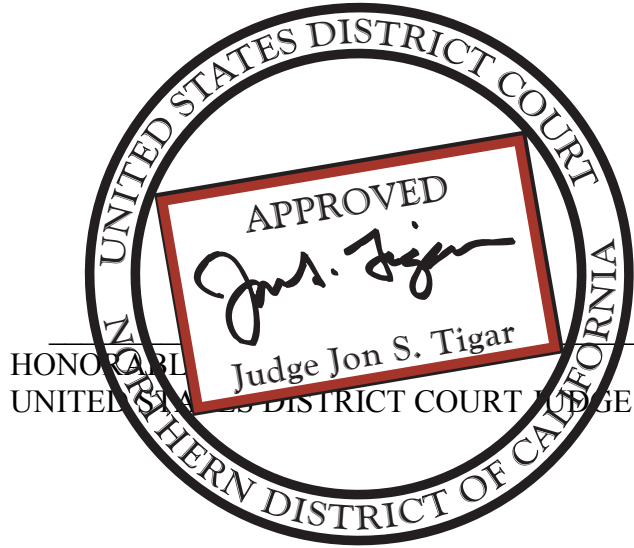
23 6. For any response to Plaintiff’s FOIA Requests for which Defendant has not completed its
24 response by November 23, 2015, Defendant shall release responsive documents in a phased process as
25 expeditiously as possible as Defendant completes its review, and that the parties anticipate the rate of
26 release will approximate 2,500 pages every four weeks thereafter until the process is complete.

27 7. The parties stipulate and request that the Case Management Conference currently
28 scheduled for November 10, 2015 be continued to December 15, 2015 or any date thereafter that is

1 It is further ordered that for any response to Plaintiff's FOIA Requests for which Defendant has
2 not completed its response by November 23, 2015, Defendant shall continue to release all documents
3 responsive to Plaintiff's FOIA request in a phased process as expeditiously as possible as Defendant
4 completes its review at a rate of release no less than 2,500 pages every four weeks thereafter until the
5 process is complete.

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8 **IT IS SO ORDERED.**

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10 DATED: October 1, 2015



HONORABLE
UNITED STATES DISTRICT COURT JUDGE