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9 **UNITED STATES DISTRICT COURT**
 10 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
 11 **SAN FRANCISCO DIVISION**

12 ELECTRONIC FRONTIER FOUNDATION,)	Case No. 16-cv-02041-HSG
)	
13 Plaintiff,)	STIPULATION AND ORDER TO
)	EXTEND DEADLINE FOR FILING
14 v.)	PLAINTIFF'S REPLY
)	
15 UNITED STATES DEPARTMENT)	
16 OF JUSTICE,)	
)	
17 Defendant.)	

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1 The parties stipulate and respectfully request the Court extend the deadline for filing
2 Plaintiff's Reply in Support of its Motion for Partial Summary Judgment until November 28, 2016.

3 Good cause exists for this request as follows:

4 1. The Department of Justice (the "Department") filed its Reply in Support of its Motion
5 for Partial Summary Judgment and Opposition to Plaintiff's Cross Motion for Partial Summary
6 Judgment on November 3, 2016.

7 2. After reviewing the agency's brief, Plaintiff contacted the Department by email on
8 November 7, 2016 to discuss narrowing Plaintiff's request and, thus, further reducing the matters in
9 dispute in this litigation.

10 3. By email to Plaintiff on November 11, 2016, the Department represented that it
11 would require additional time to discuss the proposed narrowing, both internally and with other
12 affected government agencies. Thus, the Department did not expect it could provide a full response
13 before the filing of Plaintiff's Reply brief, currently scheduled for November 17, 2016.

14 4. To allow for further discussions between the parties before the filing of Plaintiff's
15 Reply, the parties agreed that the deadline for filing should be extended.

16 Accordingly, the parties respectfully request the Court extend the deadline for the filing of
17 Plaintiff's Reply until November 28, 2016.

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19 DATED: November 14, 2016

/s/ Mark Rumold
Mark Rumold

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25 DATED: November 14, 2016

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3 /s/ Rodney Patton
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14 *Attorneys for Defendant*

15 **DECLARATION PURSUANT TO LOCAL RULE 5-1(I)(3)**

16 Pursuant to Civil L.R. 5-1(i)(3), I, Mark Rumold, declare that I obtained the concurrence of
17 Rodney Patton, counsel for Defendant, United States Department of Justice, in the filing of this
18 document.


19 I declare under penalty of perjury under the laws of the United States that the foregoing is
20 true and correct. Executed this 14th day of November, 2016 in San Francisco, California.

21 /s/ Mark Rumold
22 Mark Rumold

23 Upon consideration of the parties' stipulation concerning an extension of time in which to
24 file a Plaintiff's Reply, it is:

25 **ORDERED** that plaintiff's deadline to file its Reply is extended to November 28, 2016.

26 DATED: November 14, 2016

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28 HON. HAYWOOD S. GILLIAM, JR.
DISTRICT COURT JUDGE