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*Counsel for the United States and the  
 appearing Individual Defendants*

United States District Court  
 Northern District of California

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

14 RENÉ QUIÑONEZ and  
 15 MOVEMENT INK LLC,  
 16  
 17 Plaintiffs,  
 18  
 19 v.  
 20 UNITED STATES OF AMERICA; and  
 21 JEFF AGSTER, EVA CHAN, STEPHEN  
 22 FAJARDO, MARK HODGES, ROBIN LEE,  
 23 and DOES 1 through 2, United States Postal  
 24 Service and United States Postal Inspection  
 25 Service officials in their individual capacities,  
 26  
 27 Defendants.

Case No. 3:22-cv-3195-WHO

**STIPULATED REQUEST  
 TO RESET HEARING DATE OF  
 PENDING MOTIONS TO DISMISS  
 [ECF 64, 65]**

Judge: Hon. William H. Orrick

23 Plaintiffs, Defendant United States, and the appearing individual Defendants respectfully  
 24 stipulate to and request under Local Rule 6-2 that the Court reset the hearing date for Defendants’  
 25 pending motions to dismiss Plaintiffs’ Second Amended Complaint, from July 12 to June 21. This  
 26 is the first request for a modification of time regarding the pending motions.

27 Defendants initially planned to notice the motions hearing for June 21, but Plaintiffs

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Northern District of California

1 requested that they notice it for June 28 because of a scheduling conflict. On May 17, Defendants  
2 did so. On May 18, the Court reset the date from June 28 to July 12. But Plaintiffs' counsel will be  
3 out of the country for a previously planned vacation on July 12. And Plaintiffs' counsel's conflict  
4 with June 21 has since been resolved. Accordingly, Plaintiffs and Defendants respectfully stipulate  
5 to and request that the hearing be reset to June 21.

6 We note that, accounting for the parties' and the Court's availability, if June 21 is no longer  
7 available, it appears the next opportunity for the hearing will not be until October 11. This is based  
8 on the Court's posted availability, Plaintiffs' counsel's July travel, and Defendants' counsel's July  
9 to October parental leave.

10 This stipulated request is supported by the accompanying declaration by Plaintiffs' counsel.

11 Dated: May 19, 2023

12 s/ Jaba Tsitsuashvili  
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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: May 22, 2023

  
Hon. William H. Orrick  
United States District Court Judge