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13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 SAN FRANCISCO DIVISION

16 AMERICAN CIVIL LIBERTIES UNION OF)
 17 NORTHERN CALIFORNIA and)
 18 LAWYERS COMMITTEE FOR CIVIL RIGHTS)
 19 OF THE SAN FRANCISCO BAY AREA,)

20 Plaintiff,

21 v.

22 DEPARTMENT OF HOMELAND)
 23 SECURITY,)

24 Defendant.

PJH 08-2744

**STIPULATED REQUEST FOR AN
 ORDER STAYING THE CURRENT
 BRIEFING SCHEDULE AND
 ENLARGING THE TIME FOR THE
 PARTIES TO ENGAGE IN
 SETTLEMENT NEGOTIATIONS**

25 Pursuant to Civil L.R. 6-2, the parties, through undersigned counsel, hereby stipulate to a stay
 26 of the current briefing schedule and an enlargement of time of 60 days for the parties to continue
 27 settlement negotiations.¹ As grounds for this stipulation, Defendant states as follows:

28 1. On April 20, 2009, the parties filed a stipulation seeking an enlargement of time of 30
 days for the defendant to move for summary judgment in order to afford the parties the opportunity to
 engage in settlement discussions.

¹ Defendant's summary judgment motion is currently due on May 26, 2009.

1 2. While the settlement negotiations have been progressing during this time, certain issues
2 remain unresolved.

3 3. The parties seek additional time in order to resolve, if possible, any outstanding issues and
4 to settle this matter amicably, without the need for further litigation.

5 4. Accordingly, the parties seek an additional 60 days to complete its settlement negotiations,
6 and to report back to the Court at that time to inform the Court of the status of settlement. The parties
7 therefore ask that the current summary judgment briefing schedule be stayed during this period to
8 allow both sides to be fully engaged in settlement negotiations. The parties propose that they provide
9 a joint report to the Court regarding the status of settlement negotiations by no later than July 31,
10 2009.

11 6. This stipulation is supported by the Declaration of Isaac Campbell, filed herewith.

12 For the reasons set forth above, and in the Declaration of Isaac R. Campbell, the parties
13 hereby move for an order granting a stay of the current briefing schedule, an enlargement of time of
14 60 days for the parties to continue settlement negotiations, and to provide a joint report to the Court
15 on or before July 31, 2009.

16 Dated: May 21, 2009

17 /s/ Isaac R. Campbell
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25
26 **ORDER**

27 PURSUANT TO STIPULATION, IT IS SO ORDERED.

28 DATED: May 26, 2009

Honorable Phyllis J. Hamilton



5/21/09 Stip. Req. For Order Changing Time of Due Date of Def's Summary Judgment. Judg. Mot. 08-2744 (PJH)