

Gary A. Nye, Esq. (Cal. Bar No. 126104)  
David R. Ginsburg, Esq. (Cal. Bar No. 210900)  
ROXBOROUGH, POMERANCE, NYE & ADREANI, LLP  
5820 Canoga Avenue, Suite 250  
Woodland Hills, California 91367  
Telephone: (818) 992-9999  
Facsimile: (818) 992-9991  
Email: gan@rpnalaw.com; drg@rpnalaw.com

Attorneys for Plaintiff  
Gonzales & Gonzales Bonds and Insurance Agency, Inc.

MELINDA HAAG (CSBN 132612)  
United States Attorney  
ALEX G. TSE (CSBN 152348)  
Chief, Civil Division  
ANN MARIE REDING (CSBN 226864)  
Assistant United States Attorney  
450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-6813  
Fax: (415) 436-6748  
Email: annie.reding@usdoj.gov

Attorneys for Defendant  
United States Department of Homeland Security

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA - OAKLAND DIVISION**

GONZALES & GONZALES BONDS  
AND INSURANCE AGENCY, INC.,

Plaintiff,

vs.

UNITED STATES DEPARTMENT OF  
HOMELAND SECURITY,

Defendant.

Case No. C 11-02267 DMR

Honorable Donna M. Ryu

**STIPULATION AND ~~PROPOSED~~  
ORDER EXTENDING THE DEADLINE  
FOR PLAINTIFF TO FILE MOTION FOR  
ATTORNEY'S FEES AND BILL OF  
COSTS**

1 Plaintiff Gonzales & Gonzales Bonds and Insurance Agency, Inc. (“G&G” or  
2 “Plaintiff”) and Defendant United States Department of Homeland Security (“DHS”), by and  
3 through their respective counsel, make the following representations and stipulate and agree as  
4 follows:

5 G&G and DHS are continuing to engage in meet and confer efforts regarding G&G’s  
6 motion for attorney’s fees and bill of costs based on the Court’s Order of December 21, 2012,  
7 which ruled upon the parties’ motions for summary judgment in this Freedom of Information  
8 Act case.

9 The current filing deadline for the motion and bill of costs is March 12, 2013. The  
10 parties seek to extend this deadline by one week, to March 19, 2013, to allow for additional  
11 time to meet and confer. The parties respectfully request that the Court approve this requested  
12 extension.

13 This is the third requested extension of the original January 4, 2013 deadline.  
14 DHS’ deadline for filing opposition to G&G’s motion for attorney’s fees and bill of costs  
15 would continue to be 30 days from the filing of G&G’s motion and bill of costs.

16 The requested extension would not affect the schedule for the case.

17 Nothing herein shall constitute a waiver of DHS’ right to oppose or object to G&G’s  
18 motion for attorney’s fees and bill of costs.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: March 8, 2013

Respectfully submitted,  
ROXBOROUGH, POMERANCE, NYE & ADREANI, LLP  
  
/s/ David R. Ginsburg  
Gary A. Nye  
David R. Ginsburg  
Attorneys for Plaintiff  
Gonzales & Gonzales Bonds and Insurance  
Agency, Inc.

Dated: March 8, 2013

Respectfully submitted,  
MELINDA HAAG  
United States Attorney  
  
/s/ Ann Marie Reding  
ANN MARIE REDING  
Assistant United States Attorney  
Attorneys for Defendant  
Department of Homeland Security

~~PROPOSED~~ ORDER

Pursuant to the stipulation by the parties, the Court extends from March 12, 2013 to March 19, 2013, the deadline for G&G to file its motion for attorney's fees and its bill of costs. DHS' deadline to file opposition to G&G's motion for attorney's fees and bill of costs will remain 30 days from the filing of G&G's motion and bill of costs.

IT IS SO ORDERED.

Dated: March 11, 2013



---

THE HONORABLE DONNA M. RYU  
UNITED STATES MAGISTRATE JUDGE