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 23 United States Department of Homeland Security

24 **UNITED STATES DISTRICT COURT**

25 **NORTHERN DISTRICT OF CALIFORNIA - OAKLAND DIVISION**

26 GONZALES & GONZALES BONDS
 27 AND INSURANCE AGENCY, INC.,

28 Plaintiff,

29 vs.

30 UNITED STATES DEPARTMENT OF
 31 HOMELAND SECURITY,

32 Defendant.

33 Case No. C 11-02267 DMR

34 Honorable Donna M. Ryu

35 **STIPULATION AND [PROPOSED]
 36 ORDER EXTENDING THE DEADLINE
 37 FOR PLAINTIFF TO FILE MOTION FOR
 38 ATTORNEY'S FEES AND BILL OF
 39 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 meaningful meet and confer discussions
6 regarding G&G’s motion for attorney’s fees and bill of costs based on the Court’s Order of
7 December 21, 2012, which ruled upon the parties’ motions for summary judgment in this
8 Freedom of Information Act case. The most recent discussion occurred on March 21, 2013,
9 and the parties expect to continue discussions over the next couple weeks. The parties’ mutual
10 goal is to resolve the fee and cost issue without the need for motion work and a hearing on the
11 matter; however, the negotiations are taking more time than the parties anticipated.

12 The current filing deadline for the motion and bill of costs is April 2, 2013. Based on
13 their most recent meet and confer, the parties agree that an extension to May 15, 2013 would
14 allow for further meaningful discussion. The parties therefore respectfully request that the
15 Court approve this requested extension.

16 This is the fifth requested extension of the original January 4, 2013 deadline.

17 DHS’ deadline for filing opposition to G&G’s motion for attorney’s fees and bill of
18 costs would continue to be 30 days from the filing of G&G’s motion and bill of costs.

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

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

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Dated: March 22, 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 22, 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

1 **[PROPOSED] ORDER**

2 Pursuant to the stipulation by the parties, the Court extends from April 2, 2013 to May
3 15, 2013, the deadline for G&G to file its motion for attorney's fees and its bill of costs. DHS'
4 deadline to file opposition to G&G's motion for attorney's fees and bill of costs will remain 30
5 days from the filing of G&G's motion and bill of costs.

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7 IT IS SO ORDERED.

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10 Dated: March 25, 2013



11 _____
12 THE HONORABLE DONNA M. RYU
13 UNITED STATES MAGISTRATE JUDGE
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