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25 **UNITED STATES DISTRICT COURT**

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

27 GONZALES & GONZALES BONDS
28 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 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 May 2, 2013, and
9 the parties expect to continue discussions over the next couple months. 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.

12 The current filing deadline for the motion and bill of costs is May 15, 2013. Based on
13 their most recent meet and confer, the parties agree that an extension to July 17, 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 sixth 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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1 Respectfully submitted,

2 Dated: May 6, 2013

ROXBOROUGH, POMERANCE, NYE & ADREANI, LLP

3 /s/ David R. Ginsburg

4 Gary A. Nye

5 David R. Ginsburg

6 Attorneys for Plaintiff

Gonzales & Gonzales Bonds and Insurance

7 Agency, Inc.

8 Respectfully submitted,

9 Dated: May 6, 2013

10 MELINDA HAAG

11 United States Attorney

12 /s/ Ann Marie Reding

13 ANN MARIE REDING

14 Assistant United States Attorney

15 Attorneys for Defendant

16 Department of Homeland Security

[PROPOSED] ORDER

Pursuant to the stipulation by the parties, the Court extends from May 15, 2013 to July 17, 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: May 7, 2013

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THE HONORABLE DONNA M. RYU
UNITED STATES MAGISTRATE JUDGE