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Attorney for Plaintiff
ELECTRONIC FRONTIER FOUNDATION

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

ELECTRONIC FRONTIER FOUNDATION,)
)
Plaintiff,)
)
v.)
)
DEPARTMENT OF HOMELAND SECURITY,)
)
Defendant.)
_____)

Case No.: 4:12-cv-5580 PJH
AMENDED
**STIPULATION AND [~~PROPOSED~~]
ORDER TO CONTINUE CASE
MANAGEMENT CONFERENCE**

Date: March 7, 2013
Time: 2:00 PM
Place: Courtroom 3, 3rd Floor
Hon. Phyllis J. Hamilton

1 Plaintiff Electronic Frontier Foundation and Defendant Department of Homeland Security
2 have conferred and hereby stipulate to and respectfully request the Court continue the initial Case
3 Management Conference from its currently scheduled date of March 7, 2013 to March 21, 2013 or
4 to the Court's earliest convenience thereafter.

5 Counsel for Plaintiff is scheduled to speak at a conference out of town on March 8, 2013
6 and must travel on March 7, 2013. Counsel for Defendant is scheduled to be out of the country on
7 vacation on March 14, 2013. March 21, 2013 is the first date that counsel for both parties will be
8 available.

9 The requested time modification should not adversely affect the Court's schedule because
10 this is a case pursuant to the Freedom of Information Act and the parties have been in
11 communications about the agency's search for records and a possible processing and production
12 schedule.

13 DATED: January 28, 2013

Respectfully submitted,

14
15 By: /s/ Jennifer Lynch
Jennifer Lynch, Esq.
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San Francisco, CA 94110
17 Telephone: (415) 436-9333
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19 Attorney for Plaintiff
ELECTRONIC FRONTIER FOUNDATION

20 By: /s/ Jennie L. Kneedler
Jennie L. Kneedler, Esq.
United States Trial Attorney
21 UNITED STATES DEPARTMENT OF JUSTICE
22 Civil Division, Federal Programs Branch
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26 Attorney for Defendant
27 UNITED STATES DEPT. OF HOMELAND
SECURITY
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DECLARATION PURSUANT TO L.R. 5.1

I, Jennifer Lynch, hereby declare that I have obtained Defendant's concurrence in the filing of this document from Jennie L. Kneedler, counsel for Defendant.

Executed on January 28, 2013, in San Francisco, California.

/s/ Jennifer Lynch
Jennifer Lynch

* * * * *

PURSUANT TO STIPULATION, **IT IS SO ORDERED**. The case management conference is continued to March 21, 2013 at 2:00 p.m.

Dated: 1/29/13

