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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

ALLIANCE OF CALIFORNIANS FOR COMMUNITY EMPOWERMENT, et al, Plaintiffs, v. FEDERAL HOUSING FINANCE AGENCY, Defendant.	CASE NO. 13-05618 KAW JOINT STIPULATED REQUEST FOR ORDER CHANGING TIME AND ~~[PROPOSED]~~ ORDER

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Defendant Federal Housing Finance Agency ("Defendant") and Plaintiffs Alliance of Californians for Community Empowerment; Housing and Economic Rights Advocates; Action United Pennsylvania; Alliance for a Just Society; Urban Revival dba City Life/Vita Urbana; Colorado Foreclosure Resistance Coalition; Home Defenders League; New Jersey Communities United; New York Communities for Change (collectively, "Plaintiffs"), by and through their respective counsel, stipulate to further extend the time for Defendant to respond to Plaintiffs' Complaint pursuant to Civil Local Rule 6-1(a) of the Northern District of California, as follows:

1. On December 5, 2013, Plaintiffs filed their Complaint for Declaratory and Injunctive Relief under the Freedom of Information Act ("Complaint"). Dkt. No. 1.

2. On February 3, 2014, Defendant filed its Answer. Dkt. No. 20.

3. On April 1, 2014, this Court entered briefing schedule for Cross-Motions for Summary Judgment. Dkt. No. 34.

4. In conformance with the schedule, on May 15, 2014, Defendant filed its Motion for Summary Judgment. Dkt. No. 35-39.

5. Also in conformance with the schedule, on June 5, 2014, Plaintiffs filed their Cross Motion for Summary Judgment (Partial) and Opposition. Dkt. No. 41-43.

6. On June 18, 2014, Defendant discovered that during its search for records responsive to Plaintiffs' FOIA Request, its search tool did not reach all email records of one custodian. Due to these extenuating circumstances and in order to correct this issue and proceed with resolution of this matter, the Parties agreed to extend the time for Defendant's submission of its Reply and Opposition from June 19, 2014 to June 24, 2014. Accordingly, the Parties also agreed to extend the time for submission of Plaintiffs' Reply from July 3, 2014 to July 10, 2014.

7. Plaintiffs wish to accommodate Defendant's request for an extension of time to file its Reply and Opposition, but have external scheduling constraints, including prior scheduling commitments and the fact that lead counsel for Plaintiffs will shortly be on maternity leave, as discussed with the Court during the Case Management Conference on April 1, 2014. Plaintiffs' counsel's last day before her leave is July 18, 2014. Accordingly, the Parties respectfully request that the hearing date remain on July 18, 2014 as currently ordered by the Court. The Parties further respectfully request that

any extension of time to file Defendant's Reply and Opposition not reduce the amount of time Plaintiffs would have had to prepare its Reply under the prior briefing schedule. Accordingly, and to accommodate other scheduling commitments previously set by counsel for Plaintiffs, the Parties respectfully request that Plaintiffs' Reply be due July 10, 2014.

8. The parties hereby stipulate and respectfully request that to allow time to correct the search issue and accommodate other previously set scheduling commitments, the time for Defendant's submission of its Reply and Opposition be extended to June 24, 2014 and the time for submission of Plaintiffs' Reply be extended to July 10, 2014, and, further, that the hearing on this matter remain on calendar as currently scheduled for July 18, 2014.

IT IS SO STIPULATED.

DATED: June 18, 2014

By: /s/ Linda Lye
LINDA LYE
Attorney for Plaintiffs

DATED: June 18, 2014

MELINDA HAAG
United States Attorney

By: /s/ Rebecca A. Falk
REBECCA A. FALK[1]
Assistant United States Attorney
Attorneys for Federal Defendant

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[1] I, Rebecca A. Falk, hereby attest, in accordance with the Civil L.R. 5(i)(3), the concurrence in the filing of this document has been obtained from the other signatory listed here.

~~[PROPOSED]~~ ORDER

Pursuant to the stipulation by the parties, and good cause having been shown, it is hereby ordered that the time for Defendant's submission of its Reply and Opposition is extended to June 24, 2014 and the time for submission of Plaintiffs' Reply is extended to July 10, 2014. The hearing for this matter will proceed on July 18, 2014.

IT IS SO ORDERED.

DATED: June 19, 2014

HONORABLE KANDIS A WESTMORE
UNITED STATES MAGISTRATE JUDGE