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 11 **UNITED STATES DISTRICT COURT**
 12 **NORTHERN DISTRICT OF CALIFORNIA**
 13 **SAN FRANCISCO DIVISION**

14 **THE REPUBLIC OF THE MARSHALL ISLANDS,**)
) Case No. 3:14-cv-01885-JSW
)
 15 Plaintiff,) **Stipulation to Set Briefing Schedule**
) **and to Reschedule the Case**
 16 v.) **Management Conference**
) **and Order Thereon as Modified**
 17 **THE UNITED STATES OF AMERICA, et al.,**)
)
 18 Defendants.

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 21 The parties agree to extend the time for Defendants to respond to the Complaint and to
 22 set a briefing schedule for a motion filed pursuant to Federal Rule of Civil Procedure 12. The
 23 parties also agree, pursuant to this Court’s approval, to reschedule the case management
 24 conference, currently scheduled for August 1, 2014. In support thereof, the parties state as
 25 follows:
 26

- 27 1. Defendants’ response to Plaintiff’s Complaint is currently due on July 11, 2014.
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1 2. The Deputy Branch Director that is responsible for supervision of this case on
2 behalf of the federal Defendants will be out of the office on July 11 due to previously-scheduled
3 travel plans. Accordingly, Defendants request a short extension of 10 days to allow for the
4 review and completion of the Defendants' response to the Complaint.

5 3. The parties have also consulted and agreed upon a schedule for the filing of
6 memoranda in the event that Defendants file a motion pursuant to Federal Rule of Civil
7 Procedure 12 that would allow counsel sufficient time to consult with their clients and prepare
8 said memoranda. Assuming the filing of such a motion, the schedule would proceed as follows:

10 Defendants' Rule 12 Motion	July 21, 2014
11 Plaintiffs' Opposition	August 21, 2014
12 Defendants' Reply	September 8, 2014

13 4. This proposed briefing schedule would not affect any established deadlines.

14 5. The Case Management Conference in this matter has been set for August 1, 2014.

15 6. Undersigned counsel for the federal Defendants will be on previously-scheduled
16 leave on August 1, 2014 and August 8, 2014. Therefore, counsel for Defendants will be
17 unavailable on those dates. Accordingly, and to fully accommodate the proposed briefing
18 schedule set forth above, the parties respectfully request to reschedule the Case Management
19 Conference for September 12, 2014, or a time thereafter that is convenient for the Court.
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24 Dated: June 11, 2014

Respectfully submitted,

25 STUART F. DELERY
26 Assistant Attorney General

27 ANTHONY J. COPPOLINO
28 Deputy Branch Director

/s/ Eric R. Womack

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Counsel for Plaintiff

The Court shall set a case management conference, if necessary, in its order resolving the motion to dismiss.
PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 11, 2014



Hon. JEFFREY S. WHITE
United States District Judge