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16 Attorney for Federal Defendant

17 **UNITED STATES DISTRICT COURT**  
 18 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
 19 **SAN FRANCISCO DIVISION**

20 THE CENTER FOR INVESTIGATIVE )  
 21 REPORTING, )  
 22 Plaintiff, )  
 23 v. )  
 24 UNITED STATES DEPARTMENT OF )  
 25 HOMELAND SECURITY, )  
 26 Defendant. )

**CASE NO. 4:18-CV-00044-KAW**

**JOINT STIPULATION AND ~~[PROPOSED]~~ ORDER TO CONTINUE CASE MANAGEMENT CONFERENCE**

27 Whereas, counsel for plaintiff The Center for Investigative Reporting will be at a pre-planned event as a speaker at a law school;

28 Whereas the parties wish to further meet and confer to narrow the issues in this case; and

1           Whereas all parties who have appeared in this case have consented to adjust certain dates  
2 and deadlines in this case in order to accommodate the schedule.

3           Pursuant to Local Civil Rule 6-2, the parties who have appeared in this case stipulate as  
4 follows:

- 5           1) The Case Management Conference is currently scheduled for April 3, 2018.
- 6           2) Subject to the Court's approval, we respectfully request that the Court continue  
7           the Initial Case Management Conference to April 17, 2018 at 1:30 pm, or  
8           another available date at the Court's convenience.
- 9           3) The last day to meet and confer, file Rule 26(f) Report, complete initial  
10           disclosures or state objection in Rule 26(f) Report and file Case Management  
11           Statement shall be April 10, 2018.
- 12           4) This change is necessary because it raises a conflict for plaintiff's and  
13           defendant's counsel was unavailable in this case and parties require more time to  
14           meet and confer.
- 15           5) All counsel have agreed to this change.
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20 DATED: March 22, 2018

By: /s/ D. Victoria Baranetsky

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Attorney for Plaintiff

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DATED: March 22, 2018

By: \*\*/s/ David Pereda

David Pereda  
Assistant United States Attorney  
  
Attorney for Defendant

\*\* THE ELECTRONIC SIGNATORY OBTAINED APPROVAL FROM THIS SIGNATORY.

**[PROPOSED] ORDER**

Based on the Joint Stipulation of the parties, and good cause appearing therefore, IT IS ORDERED that the CASE MANAGEMENT CONFERENCE currently set for April 3, 2018 be and hereby is continued to 4/17/18. Statement due 4/10/18 IT IS SO ORDERED.

DATED: 3/22/18

By: *Kandis Westmore*

HONORABLE KANDIS A. WESTMORE  
UNITED STATES MAGISTRATE JUDGE