



1 Pursuant to Civil Local Rules 6-2 and 7-12, the parties to this action hereby stipulate and request  
2 that the Court extend by two weeks, to January 31, 2023, the time for Defendant United States Attorney  
3 for the Northern District of California to file its reply in support of its motion to dismiss.

4 The parties request this change because Plaintiff filed his opposition brief one week late, on  
5 January 17, 2023—the same day that Defendant’s reply would otherwise be due. *See* Dkt. Nos. 14, 21.  
6 Additionally, counsel for Defendant has multiple other briefs due and hearings scheduled over the next  
7 two weeks, and the requested extension would better accommodate counsel’s schedule.

8 This is the parties’ first joint request to modify the schedule in this case. *See* Declaration of  
9 Kelsey J. Helland (“Helland Decl.”) ¶ 4. Defendant previously filed an administrative motion to  
10 continue the Initial Case Management Conference and related deadlines pending resolution of  
11 Defendant’s pending motion to dismiss, *see* Dkt. No. 17, which the Court granted on January 14, 2023,  
12 *see* Dkt. No. 20. The requested modification will not impact the schedule for the case because the  
13 hearing on Defendant’s motion to dismiss is scheduled for April 27, 2023, nearly three months after  
14 Defendant’s reply would be due under the requested modified schedule. Helland Decl. ¶ 5.

15  
16 DATED: January 17, 2023

Respectfully submitted,

STEPHANIE M. HINDS  
United States Attorney

/s/ Kelsey J. Helland<sup>1</sup>  
KELSEY J. HELLAND  
Assistant United States Attorney

*Attorneys for Defendant*

17  
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22 DATED: January 17, 2023

/s/ Michael Bruzzone  
MICHAEL BRUZZONE


*Plaintiff Pro Se*

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27 <sup>1</sup> *In compliance with Civil Local Rule 5-1(h)(3), the filer of this document attests under penalty of perjury*  
28 *that all signatories have concurred in the filing of this document.*

**ORDER**

Pursuant to stipulation, IT IS SO ORDERED. Defendant's reply in support of its motion to dismiss shall be due by January 31, 2023.

DATED: 1/18/2023

  
HON. HAYWOOD S. GILLIAM, JR.  
United States District Judge

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