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15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

17 WILEY GILL; JAMES PRIGOFF; TARIQ
18 RAZAK; KHALID IBRAHIM; and AARON
CONKLIN,

19 Plaintiffs,

20 v.

21 DEPARTMENT OF JUSTICE; LORETTA
LYNCH, in her official capacity as the
22 Attorney General of the United States;
PROGRAM MANAGER – INFORMATION
23 SHARING ENVIRONMENT;
KSHEMENDRA PAUL, in his official
24 capacity as the Program Manager of the
Information Sharing Environment,

25 Defendants.

Case No. 3:14-cv-03120 (RS)

STIPULATION AND [PROPOSED]
ORDER CONTINUING CASE
MANAGEMENT CONFERENCE

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28 STIPULATION AND [PROPOSED] ORDER
CONTINUING CASE MANAGEMENT
CONFERENCE 3:14-CV-03120 (RS)

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1. On October 16, 2014, Defendants filed a motion to dismiss Plaintiffs’ complaint (ECF No. 21), which the Court denied on February 20, 2015 (ECF No. 38).

2. On March 12, 2015, the Court held a case management conference and ordered the parties to provide an administrative record for Defendant Program Manager of the Information Sharing Environment’s (“Program Manager”) standard on suspicious activity and setting a further case management conference for July 9, 2015. (ECF Nos. 40, 41.)

3. The parties disagree regarding the availability of discovery on Plaintiffs’ claims related to Defendant Department of Justice’s (“DOJ”) alleged standard on suspicious activity reporting. Plaintiffs have filed a motion on this issue. (ECF No. 50.) The court has entered a stipulated order setting forth a briefing schedule and setting a hearing on this matter for August 20, 2015. (ECF No. 49.)

4. Defendants have filed a certified administrative record for Defendant Program Manager’s standard on suspicious activity. (ECF No. 52.)

5. In light of the pending motion regarding the availability of discovery on Plaintiffs’ claims related to Defendant DOJ, the parties stipulate, subject to the court’s approval, that the case management conference currently scheduled for July 9, 2015, be continued to August 20, 2015, the same date as the hearing on Plaintiffs’ motion.

Dated: June 30, 2015

By: /s/ Linda Lye
Linda Lye

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STIPULATION AND [PROPOSED] ORDER
CONTINUING CASE MANAGEMENT
CONFERENCE 3:14-CV-03120 (RS)

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Attorneys for Defendants

[PROPOSED] ORDER

Pursuant to the Stipulation between the Parties, it is hereby ORDERED that the Case Management Conference currently set for July 9, 2015 at 10 am be continued to August 20, 2015 at 1:30 pm.

IT IS SO ORDERED.

Dated: _____

The Hon. Richard Seeborg
Judge of the United States District Court for
the Northern District of California

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FILER’S ATTESTATION

I, Linda Lye, am the ECF user whose identification and password are being used to file this STIPULATION AND [PROPOSED] ORDER CONTINUING CASE MANAGEMENT CONFERENCE. Pursuant to L.R. 5-1(i)(3), I hereby attest that concurrence in the electronic filing of this document has been obtained from each of the other signatories.

Dated: June 30, 2015

By /s/Linda Lye
Linda Lye