BENJAMIN C. MIZER 1 Principal Deputy Assistant Attorney General 2 EILEEN DECKER **United States Attorney** 3 JOHN R. TYLER 4 Assistant Director, Federal Programs Branch KATHRYN L. WYER (Utah Bar #9846) 5 U.S. Department of Justice, Civil Division 6 20 Massachusetts Avenue, N.W. 7 Washington, DC 20530 Tel. (202) 616-8475/Fax (202) 616-8470 8 kathryn.wyer@usdoj.gov 9 Attorneys for the United States 10 UNITED STATES DISTRICT COURT 11 CENTRAL DISTRICT OF CALIFORNIA 12 HUMAN RIGHTS WATCH, NO. CV 2:15-2573 PSG (JPR) 13 14 JOINT PROPOSED Plaintiff, STIPULATION TO EXTEND v. 15 REMAINING DEADLINES SET 16 DRUG ENFORCEMENT FORTH IN COURT'S AUGUST ADMINISTRATION et al., 14, 2015 ORDER 17 18 Defendants. Date: 19 Time: Courtroom 880 - Roybal 20 Hon. Philip S. Gutierrez 21 22 23 The parties, by and through undersigned counsel, jointly stipulate and move 24 this Court to extend the remaining deadlines for Interrogatory responses and 25 briefing set forth in the Court's Order of August 14, 2015, in light of the following: 26 Pursuant to the Court's Order of August 14, 2015, Plaintiff served 27 Interrogatories on Defendants on September 11, 2015. Undersigned counsel for 28

Defendants was out of the office from September 14, 2015, until September 25, 1 2015, and undersigned counsel's supervisor is out of the office through October 13, 2 2015. In addition, some client agency personnel, including a signatory to the 3 Interrogatories, are currently on work-related travel and will be out of town the rest 4 of this week, which has interfered with finalizing Defendants' responses. 5 Accordingly, the parties have agreed to a 1-week extension for Defendants to serve 6 responses to Plaintiff's Interrogatories, and similar extensions for the related 7 supplemental briefing. 8 9 WHEREFORE, the parties hereby jointly stipulate and respectfully move this 10 Court to enter an Order extending the remaining deadlines set forth in its August 11 14, 2015, Order as follows: 12 13 Deadline for the Government's interrogatory responses: October 20, 2015 14 Deadline for HRW's supplemental briefing: November 16, 2015 15 December 2, 2015 Deadline for the Government's response briefing: 16 17 Respectfully submitted, Dated: October 13, 2015 18 19 BENJAMIN C. MIZER 20 Principal Deputy Assistant Attorney General 21 EILEEN DECKER **United States Attorney** 22 JOHN R. TYLER 23 Assistant Director, Federal Programs Branch 24 /s/ Kathryn L. Wyer 25 KATHRYN L. WYER (Utah #9846) 26 U.S. Department of Justice, Civil Division 20 Massachusetts Avenue, N.W. 27 Washington, DC 20530 28 Tel. (202) 616-8475/Fax (202) 616-8470

1		kathryn.wyer@usdoj.gov
2		Attorneys for the Defendants
3		
4	Dated: October 13, 2015	/s/Mark Rumold
5		MARK RUMOLD DAVID GREENE
6		NATHAN D. CARDOZO
7		LEE TIEN
8		KURT OPSAHL HANNI FAKHOURY
9		JAMIE L. WILLIAMS
10		ANDREW CROCKER
11		ELECTRONIC FRONTIER FOUNDATION
12		Counsel for Plaintiff Human Rights Watch
13		Counsel for I turning Human Ragins Water
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		

BENJAMIN C. MIZER 1 Principal Deputy Assistant Attorney General 2 EILEEN DECKER **United States Attorney** 3 JOHN R. TYLER 4 Assistant Director, Federal Programs Branch KATHRYN L. WYER (Utah Bar #9846) 5 U.S. Department of Justice, Civil Division 6 20 Massachusetts Avenue, N.W. 7 Washington, DC 20530 Tel. (202) 616-8475/Fax (202) 616-8470 8 kathryn.wyer@usdoj.gov 9 Attorneys for the United States 10 UNITED STATES DISTRICT COURT 11 CENTRAL DISTRICT OF CALIFORNIA 12 HUMAN RIGHTS WATCH, NO. CV 2:15-2573 PSG (JPR) 13 14 Plaintiff, ORDER ON PROPOSED STIPULATION TO EXTEND v. 15 REMAINING DEADLINES SET 16 DRUG ENFORCEMENT FORTH IN COURT'S AUGUST 14, 2015 ORDER 17 ADMINISTRATION et al., 18 Defendants. 19 20 21 The parties' Joint Proposed Stipulation and Order to Extend the Remaining 22 Deadlines set forth in the Court's August 14, 2015 Order is hereby APPROVED. 23 The remaining deadlines are hereby extended as follows: 24 25 Deadline for the Government's interrogatory responses: October 20, 2015 26 Deadline for HRW's supplemental briefing: November 16, 2015 27 Deadline for the Government's response briefing: December 2, 2015 28

Order

Order