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10 UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
11 OAKLAND DIVISION

12 THE CENTER FOR INVESTIGATIVE )  
REPORTING and MOHAMED AL ELEW, )

Case No. 4:21-cv-09680- HSG

13 )  
14 Plaintiffs, )

STIPULATION AND ORDER  
TO CONTINUE  
CASE MANAGEMENT  
CONFERENCE (as modified)

15 )  
16 v. )

17 U.S. ENVIRONMENTAL PROTECTION )  
AGENCY, )

18 )  
19 Defendant. )

20 Pursuant to Civil Local Rule 6-1(a), the parties in this action hereby stipulate and respectfully  
21 request that the Court take off calendar the Case Management Conference set for March 22, 2022, ECF  
22 No. 13, and continue it to April 5, 2021, or for another date convenient to the Court. The reasons for  
23 this request follow:

24 Through the meet and confer process, the parties have been making significant progress in this  
25 case. Defendant has been producing the information Plaintiffs requested under the Freedom of  
26 Information Act, 5 U.S.C. § 552 et seq. Defendant anticipates producing additional information in the  
27 month of March 2022. After that production is made, Defendant will have released the majority of the  
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1 information Plaintiffs requested.

2 The parties met and conferred on February 24, 2022, and agreed that it would be more  
3 productive to have a case management conference on April 5, 2022. By that time the parties will be in a  
4 better position to appraise the Court on the progress made to date, and to decide whether the case can be  
5 resolved without further litigation.

6 For the above stated reasons, the Parties respectfully request that the Court take off calendar the  
7 Case Management Conference set for March 22, 2022, and continue it to April 5, 2022. If this request is  
8 granted, the Parties will submit a Case Management Statement by March 29, 2022.

9 Respectfully submitted,

10 STEPHANIE M. HINDS  
11 United States Attorney

12 Dated: February 25, 2022

By: \_\_\_\_\_  
13 GIOCONDA R. MOLINARI  
Assistant United States Attorney

14 The Center for Investigative Reporting

15 Dated: February 25, 2022

By: \_\_\_\_\_  
16 D. VICTORIA BARANETSKY  
17 Attorney for Plaintiffs

18 In compliance with Civil Local Rule 5-1(i), the filer of this document attests that all signatories listed  
19 have concurred in the filing of this document.

**ORDER BASED ON STIPULATION**

The Case Management Conference currently set for March 22, 2022, is continued to April 5, 2022, at 2:00 p.m. Given the ongoing COVID-19 pandemic, the parties will be advised closer to the hearing whether it will take place telephonically or in person. The Parties shall file a Case Management Conference Statement by March 29, 2022.

DATED: 2/28/2022

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

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