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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

**OUR WATCH WITH TIM THOMPSON, a  
California Non-Profit Organization,**  
  
Plaintiff,  
  
v.  
  
**ROB BONTA, the Attorney General of  
California,**  
  
Defendant.

Case No. 2:23-cv-00422-DAD-DB  
**STIPULATION AND [PROPOSED]  
ORDER EXTENDING THE DEADLINE  
FOR RESPONDING TO THE SECOND  
AMENDED COMPLAINT AND  
MODIFYING THE BRIEFING  
SCHEDULE FOR DEFENDANT’S  
MOTION TO DISMISS**

Pursuant to Local Rules 143 and 144, the parties hereby submit the following joint stipulation and proposed order.

On July 18, 2023, this Court granted, in part, Defendant’s motion to dismiss Plaintiff’s First Amended Complaint (FAC). Doc. No. 22. The Court gave Plaintiff leave to file a Second Amended Complaint (SAC) within 14 days of the Court’s dismissal order. *Id.* at 21. Plaintiff filed a SAC on August 1, 2023. Doc. No. 25. Defendant’s response to the SAC would be due on August 22, 2023. Because of a pre-planned absence during this timeframe, the parties have agreed that Defendant can file its motion to dismiss the SAC on September 5, 2023. The parties wish to modify the briefing schedule for the motion to dismiss as follows:

- Plaintiff’s opposition to the motion to dismiss would be due on September 26, 2023;

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- Defendant’s reply brief would be due on October 10, 2023; and
- The hearing on the motion to dismiss would take place on October 17, 2023 at 1:30 p.m.

**IT IS SO STIPULATED.**

Dated: August 2, 2023

/s/ Mariah R. Gondeiro  
Mariah R. Gondeiro  
Attorney for Plaintiff

Dated: August 2, 2023

/s/ Nimrod Pitsker Elias  
Nimrod Pitsker Elias  
Deputy Attorney General  
Attorney for Defendant Rob Bonta,  
Attorney General of California

