KAMALA D. HARRIS, State Bar No. 146672
Attorney General of California
TAMAR PACHTER, State Bar No. 146083
Supervising Deputy Attorney General
ALEXANDRA ROBERT GORDON, State Bar No. 207650
Deputy Attorney General
455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004
Telephone: (415) 703-5509
Fax: (415) 703-5480
E-mail: Alexandra.RobertGordon@doj.ca.gov
Attorneys for Defendant Attorney General Harris

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

SACRAMENTO DIVISION

CENTER FOR COMPETITIVE POLITICS, Plaintiff, **v.** **KAMALA HARRIS, in her Official Capacity as Attorney General of the State of California,** Defendant.	2:14-cv-00636-MCE-DAD **STIPULATION AND [PROPOSED] ORDER RE EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT** **(Local Rule 144 (a))** Courtroom: 7, 14th Floor Judge: Hon. Morrison C. England, Jr. Trial Date: None Set Action Filed: March 7, 2014

Plaintiff Center for Competitive Politics and Defendant Attorney General Kamala D. Harris (collectively, the "Parties"), by and through their respective counsel, hereby stipulate and agree as follows:

WHEREAS, on March 7, 2014, Plaintiff filed its Complaint for Declaratory and Injunctive Relief;

WHEREAS, on or about March 20, 2014, Plaintiff will file a Motion for Preliminary Injunction, which will be heard on April 17, 2014, or on the earliest date thereafter that is convenient for the Court;

WHEREAS, Defendant's last day to answer or otherwise respond to Plaintiff's Complaint currently is April 1, 2014;

WHEREAS, in the interest of efficiency and economy, the Parties agree that Defendant's time to answer or otherwise respond to the Complaint should be extended until after the resolution of the Motion for Preliminary Injunction;

WHEREAS, no previous extensions have been sought;

//

//

//

//

THEREFORE, pursuant to Local Rule 144 (a) and in consideration of the foregoing, it is hereby stipulated that:

Defendant's last day to answer or otherwise respond to Plaintiff's Complaint shall be no later than 21 days after entry of this Court's order regarding the Motion for Preliminary Injunction.

Dated: March 17, 2014

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
TAMAR PACHTER
Supervising Deputy Attorney General

/s/ Alexandra Robert Gordon
ALEXANDRA ROBERT GORDON
Deputy Attorney General
Attorneys for Attorney General Harris

Dated: March 17, 2014

By: GURA & POSSESSKY, PLLC

/s/ Alan Gura
ALAN GURA
Attorneys for Plaintiff Center For Competitive Politics

Dated: March 17, 2014

By: CENTER FOR COMPETITIVE POLITICS

/s/ Allen Dickerson
ALLEN DICKERSON*
Attorneys for Plaintiff Center For Competitive Politics
*Application *pro hac vice* pending

HAVING CONSIDERED THE STIPULATION OF THE PARTIES, AND GOOD CAUSE APPEARING, **IT IS SO ORDERED**:

Dated: _____ _____

Hon. Morrison C. England, Jr.

CERTIFICATE OF SERVICE

Case Name: **Center for Competitive Politics v. Kamala Harris** No. **2:14-cv-00636-MCE-DAD**

I hereby certify that on March 17, 2014, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

STIPULATION AND [PROPOSED] ORDER RE EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on March 17, 2014, at San Francisco, California.

N. Newlin	/s/ N. Newlin
Declarant	Signature

40919140.doc