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10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE EASTERN DISTRICT OF CALIFORNIA
12 SACRAMENTO DIVISION
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14 **CENTER FOR COMPETITIVE
POLITICS,**

Plaintiff,

15
16 v.
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18 **KAMALA HARRIS, in her Official
Capacity as Attorney General of the State of
19 California,**

Defendant.
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2:14-cv-00636-MCE-DAD

**STIPULATION AND [PROPOSED]
ORDER RE STAYING DISTRICT
COURT PROCEEDINGS PENDING
PRELIMINARY INJUNCTION APPEAL**

Courtroom: 7, 14th Floor
Judge: Hon. Morrison C. England, Jr.
Action Filed: March 7, 2014
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1 Plaintiff Center for Competitive Politics and Defendant Attorney General Kamala D.
2 Harris (collectively, the “Parties”), by and through their respective counsel, hereby stipulate and
3 agree as follows:

4 WHEREAS, on May 14, 2014, this Court issued an Order denying Plaintiffs’ motion for a
5 preliminary injunction;

6 WHEREAS, on May 15, 2014, Plaintiffs filed a Notice of Appeal in the Ninth Circuit
7 Court of Appeals as to this Court’s May 14, 2014 Order denying Plaintiffs’ motion for a
8 preliminary injunction;

9 WHEREAS, in light of the pending appeal in the Ninth Circuit, and in the interest of
10 judicial economy and efficiency and to save judicial and party resources, the Parties have agreed
11 to stay district court proceedings pending appeal.

12 THEREFORE, in consideration of the foregoing, it is hereby stipulated that:

13 The district court proceedings in this case shall be stayed pending resolution of Plaintiffs’
14 preliminary injunction appeal and until the issuance of the mandate by the Ninth Circuit.

15 Dated: May 21, 2014

Respectfully submitted,

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

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

22 Dated: May 21, 2014

By: GURA & POSSESKY, PLLC

23 /s/ Alan Gura
24 ALAN GURA
Attorneys for Plaintiff Center For
25 Competitive Politics
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Dated: May 21, 2014

By: CENTER FOR COMPETITIVE POLITICS

/s/ Allen Dickerson
ALLEN DICKERSON*
Attorneys for Plaintiff Center For
Competitive Politics
* (Admitted *pro hac vice*)

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** No. **2:14-cv-00636-MCE-DAD**
v. Kamala Harris

I hereby certify that on May 21, 2014, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

STIPULATION AND [PROPOSED] ORDER RE STAYING DISTRICT COURT PROCEEDINGS PENDING PRELIMINARY INJUNCTION APPEAL

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 May 21, 2014, at San Francisco, California.

N. Newlin
Declarant

/s/ N. Newlin
Signature