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14 Attorneys for Defendant

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

19 THE UNITED STATES DEPARTMENT OF)
20 JUSTICE,)

21 Plaintiff,)

v.)

22 WORKING ASSETS FUNDING SERVICE,)
23 INC./CREDO MOBILE, INC.,)

24 Defendant.)
25)
26)

Case No. 11-cv-2667 SI

STIPULATION AND [PROPOSED]
ORDER REGARDING DEFENDANT'S
RESPONSIVE PLEADING

FILED UNDER SEAL PURSUANT TO THE
COURT'S ORDER DATED JULY 8, 2011

Hon. Susan Illston
Courtroom 10, 19th Floor

27 ORIGINAL
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APR - 4 2013
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FILED

APR 15 2013

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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RICHARD W. WIEKING
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

THE UNITED STATES DEPARTMENT OF JUSTICE,

Plaintiff,

v.

WORKING ASSETS FUNDING SERVICE, INC./CREDO MOBILE, INC.,

Defendant.

)
)
) Case No. 11-cv-2667 SI
)
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STIPULATION AND [PROPOSED] ORDER REGARDING DEFENDANT'S RESPONSIVE PLEADING

) FILED UNDER SEAL PURSUANT TO THE COURT'S ORDER DATED JULY 8, 2011
)
)


) Hon. Susan Illston
) Courtroom 10, 19th Floor
)

ORIGINAL

1 Plaintiff THE UNITED STATES DEPARTMENT OF JUSTICE ("Plaintiff") and
2 Defendant WORKING ASSETS FUNDING SERVICE, INC./CREDO MOBILE, INC.
3 ("Defendant" or "CREDO") hereby stipulate pursuant to Civil Local Rule 6-1(a) that Defendant's
4 answer or other response to the Complaint is due by April 18, 2013.

5
6 DATED: April 3, 2013

ELECTRONIC FRONTIER FOUNDATION

7 By 
8 Matthew Zimmerman

9 CINDY A. COHN
10 LEE TIEN
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Attorneys for Defendant
20 WORKING ASSETS FUNDING SERVICE, INC./
21 CREDO MOBILE, INC.

22 U.S. DEPARTMENT OF JUSTICE

23 By /s Steven Bressler
24 Steven Y. Bressler

25 TONY WEST
26 Assistant Attorney General
27 MELINDA HAAG
28 United States Attorney
ARTHUR R. GOLDBERG
SANDRA M. SCHRAIBMAN
Assistant Branch Directors
STEVEN Y. BRESSLER
Trial Attorney

U.S. Department of Justice
Civil Division, Federal Programs Branch
P.O. Box 883
Washington, D.C. 20044
(202) 514-4781 (telephone)
(202) 318-7609 (fax)

DECLARATION

I, Matthew Zimmerman, hereby declare as follows:

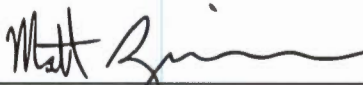
1. On March 14, 2013, this Court granted CREDO'S Petition to Set Aside National Security Letter in the related case of *In Re National Security Letter*, No. 11-2173. The above-captioned case, No. 11-2667, was stayed by stipulation (signed by this Court on October 3, 2011) pending the resolution the government's parallel motion to compel in No. 11-2173.

2. The extension of Defendant's responsive pleading deadline will have no other effect on any scheduled matter in this case.

3. I have obtained the concurrence in the filing of this document from the other signatory listed above.

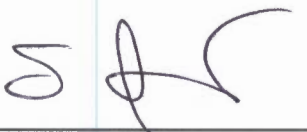
I declare under penalty of perjury that the foregoing declaration is true and correct.

Executed this 4th day of April, 2013, in New York, NY.

By 
Matthew Zimmerman

IT IS SO ORDERED.

Dated: 4/15/13

By: 
Hon. Susan Illston
United States District Judge

CERTIFICATE OF SERVICE

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I, Stephanie Shattuck, certify that on April 4, 2013, pursuant to prior agreement of the parties, I caused the following documents:

to be served electronically on the government's counsel, Steven Y. Bressler, Steven.Bressler@usdoj.gov.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 4, 2013, at San Francisco, California.


Stephanie Shattuck