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

15 **THE UNITED STATES OF AMERICA,**
 16
 Plaintiff,
 17
 v.
 18
 19 **THE STATE OF CALIFORNIA, et al.,**
 20
 Defendants.

2:18-cv-02660-JAM-DB
 2:18-cv-02684-JAM-DB

**STIPULATION REGARDING EXTENSION
 OF TIME TO FILE OPPOSITION TO
 PRELIMINARY INJUNCTION MOTIONS**

Judge: The Hon. John A. Mendez
 Actions Filed: Sept. 30, 2018; Oct. 3, 2018

21 **AMERICAN CABLE ASSOCIATION, et al.,**
 22
 Plaintiffs,
 23
 v.
 24 **XAVIER BECERRA, in his official capacity**
 25 **as Attorney General of California,**
 26
 Defendant.

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**Pro hac vice* motion to be filed

1 Plaintiffs the United States of America, American Cable Association, CTIA – The
2 Wireless Association, NCTA – The Internet & Television Association, and USTelecom – The
3 Broadband Association (collectively, “Plaintiffs”), and Defendants the State of California,
4 Governor Edmund G. Brown Jr., and Attorney General Xavier Becerra (“Defendants,” and
5 collectively with Plaintiffs, the “Parties”), by and through their respective counsel, hereby
6 stipulate and agree as follows:

7 **WHEREAS**, the Court has determined that *United States v. California*, No. 2:18-cv-
8 2660-JAM-DB, and *American Cable Association v. Becerra*, No. 2:18-cv-2684-JAM-DB, are
9 related within the meaning of Local Rule 123 and has entered Related Case Orders in each case
10 (ECF Nos. 7 and 12, respectively).

11 **WHEREAS**, Plaintiffs in both actions have filed motions for a preliminary injunction
12 *United States v. California*, No. 2:18-cv-02660, ECF No. 2; *American Cable Association v.*
13 *Becerra*, No. 2:18-cv-2684-JAM-DB, ECF No. 3.

14 **WHEREAS**, the Parties stipulated and the Court ordered that the motions for a
15 preliminary injunction are to be briefed and heard on the same schedule, with the hearing set for
16 November 28, 2018. *United States v. California*, No. 2:18-cv-02660, ECF No. 11; *American*
17 *Cable Association v. Becerra*, No. 2:18-cv-2684-JAM-DB, ECF No. 24.

18 **WHEREAS**, under the briefing schedule established by the Court, Defendants’
19 opposition to the motions for a preliminary injunction is due to be filed on or by October 26,
20 2018.

21 **WHEREAS**, the Parties are filing concurrently with the present stipulation a separate
22 Stipulation and [Proposed] Order Regarding Temporary Stay of Litigation and Agreement Not to
23 Enforce Senate Bill 822, which, if accepted by the Court, would stay both actions pending
24 resolution of a separate proceeding currently pending in the Court of Appeals for the D.C. Circuit.

25 **WHEREAS**, the Parties wish to conserve judicial and party resources, and believe that a
26 brief extension of time for Defendants’ opposition to the motions for a preliminary injunction is
27 appropriate while the Court considers the Stipulation and [Proposed] Order Regarding Temporary
28 Stay of Litigation and Agreement Not to Enforce Senate Bill 822.

1 **WHEREAS**, the Parties recognize that the instant Stipulation Regarding Extension of
2 Time to File Opposition to Preliminary Injunction Motions and the accompanying Proposed
3 Order will be moot if the Court enters the [Proposed] Order Regarding Temporary Stay of
4 Litigation and Agreement Not to Enforce Senate Bill 822.

5 **NOW THEREFORE**, in consideration of the foregoing, the Parties further stipulate and
6 agree as follows:

7 1. Defendants' brief in opposition to the motions for a preliminary injunction (*United*
8 *States v. California*, No. 2:18-cv-02660-JAM-DB, ECF No. 2; *American Cable Association v.*
9 *Becerra*, No. 2:18-cv-2684-JAM-DB, ECF No. 3) shall be filed on or before October 30, 2018,
10 and shall be limited to forty (40) pages.

11 **IT IS SO STIPULATED AND AGREED.**

12 Dated: October 26, 2018

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**Pro hac vice* motion to be filed

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Dated: October 26, 2018

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Dated: October 26, 2018

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