

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

_____	)	
ELECTRONIC FRONTIER	)	
FOUNDATION,	)	
	)	
Plaintiff,	)	
vs.	)	Civil Action No. 06-cv-1773 (RBW)
	)	
DEPARTMENT OF JUSTICE,	)	
	)	
Defendant.	)	
_____	)	

**MOTION FOR OPEN AMERICA STAY**

Defendant, United States Department of Justice, on behalf of the Federal Bureau of Investigation (“FBI”), hereby moves for a stay of proceedings pursuant to 5 U.S.C. § 552(a)(6)(C), and Open America v. Watergate Special Prosecution Force, 547 F.2d 605 (D.C. Cir. 1976). In support of this motion, defendant respectfully submits the attached memorandum of points and authorities with a supporting declaration (attached as Exhibit 1), and a proposed Order. Plaintiff and defendant jointly agreed upon a proposed briefing schedule for defendant’s motion for an Open America stay. On March 27, 2007, the Court entered a minute order adopting the parties’ proposed briefing schedule. The defendant has conferred with the plaintiff, and the plaintiff has indicated that it opposes this motion.

Dated: April 2, 2007

Respectfully submitted,

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/s/ JAMES C. LUH

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