

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

WENDY E. WAGNER, *et al*,

Plaintiffs,

v.

No. 11-cv-1841 (JEB)

FEDERAL ELECTION COMMISSION,

Defendant.

STIPULATION AND PROPOSED ORDER REGARDING SCHEDULING

Plaintiffs having filed their Motion to Certify Facts, and defendant having filed its opposition thereto, and the parties have conferred on how best to proceed in order to obtain a prompt and just resolution of this case, it is hereby

STIPULATED AND AGREED that plaintiffs' Motion to Certify Facts is hereby held in abeyance, and no party shall be required to make further submissions on that Motion absent a further stipulation of the parties or an order of the Court;

STIPULATED AND AGREED that, after defendant files its answer on December 19, 2011, counsel for all parties shall meet for a conference pursuant to LCvR 16.3 and Fed. R. of Civ. Proc. Rule 26(f) at the offices of the defendant on December 20, 2011 to discuss the matters listed in LCvR 16.3(c) and develop a discovery plan that indicates the parties' views and proposals. As required by LCvR 16.3(d), counsel will submit a joint report to the Court within 14 days after the conference has concluded.

Respectfully submitted,

/s/ Alan B. Morrison
Alan B. Morrison
D. C. Bar No 073114
George Washington Law School
2000 H Street NW
Washington D.C. 20052
(202) 994 7120
(202) 994 5157 (fax)
abmorrison@law.gwu.edu.

/s/ Arthur B. Spitzer
Arthur B. Spitzer
D.C. Bar No 235960
American Civil Liberties Union of
the Nation's Capital
1400 20th Street, N.W., Suite 119
Washington, D.C. 20036
(202) 457 0800
(202) 452-1868 (fax)
artspitzer@gmail.com

Attorneys for the Plaintiffs

Anthony Herman (D.C. Bar No. 424643)
General Counsel

David Kolker (D.C. Bar No. 394558)
Associate General Counsel

Harry Summers
Assistant General Counsel

Holly J. Baker
Attorney

/s/ Seth Nesin
Seth Nesin
Attorney

COUNSEL FOR DEFENDANT
FEDERAL ELECTION COMMISSION
999 E Street NW
Washington, DC 20463
Telephone: (202) 694-1650
Fax: (202) 219-0260

So Ordered this 7th day of December 2011

James E. Boasberg
James E. Boasberg
United States District Judge