

1 MICHAEL F. HERTZ
 Deputy Assistant Attorney General
 2 DOUGLAS N. LETTER
 Terrorism Litigation Counsel
 3 JOSEPH H. HUNT
 Director, Federal Programs Branch
 4 VINCENT M. GARVEY
 Deputy Branch Director
 5 ANTHONY J. COPPOLINO
 Special Litigation Counsel
 6 MARCIA BERMAN
 Trial Attorney
 7 U.S. Department of Justice
 Civil Division, Federal Programs Branch
 8 20 Massachusetts Avenue, NW, Rm. 6102
 Washington, D.C. 20001
 9 Phone: (202) 514-4782—Fax: (202) 616-8460

10 *Attorneys for the Defendants*

11 **UNITED STATES DISTRICT COURT**
 12 **NORTHERN DISTRICT OF CALIFORNIA**
 13 **SAN FRANCISCO DIVISION**

14)	No. 3:06-md-1791-VRW
15)	STIPULATION TO DEFENDANTS'
16)	REQUEST FOR ONE (1) DAY
17)	EXTENSION OF TIME TO RESPOND
18)	TO PLAINTIFFS' MOTION FOR
19)	ATTORNEY FEES
20)	
21)	
22)	Courtroom: 6, 17th Floor
23)	Chief Judge Vaughn R. Walker
24)	
25)	
26)	
27)	
28)	

This Document Solely Relates To:

Al-Haramain Islamic Foundation of Oregon, et al. v. Obama, et al. (07-cv-109-VRW)

RECITAL

21 By Order dated June 4, 2010, the Court directed plaintiffs to file an application for
 22 attorney fees in this action, *see* Dkts. 732/124, and by Order dated June 15, 2010, set a revised
 23 briefing schedule for the matter, *see* Dkts. 735/127. On July 7, 2010, plaintiffs filed a Motion for
 24 Attorney Fees. *See* Dkts. 738/128. Under the Court's June 15 Order, Defendants's response is
 25 presently due on August 4, 2010. Defendants request one (1) additional day to complete their
 26 response – to August 5, 2010. The plaintiffs do not object.
 27
 28

1 **STIPULATION**

2 Pursuant to L.R. 6.1, the parties, through their undersigned counsel, hereby stipulate and
3 agree that the due date for Defendants' response to Plaintiffs' Motion for Attorney Fees (Dkts.
4 738/128) shall be extended from August 4, 2010 to August 5, 2010, and request that the Court
5 enter the proposed order below as an order of the Court.

6 DATED: July 29, 2010

7 Respectfully Submitted,

8 MICHAEL F. HERTZ
Acting Assistant Attorney General

9 DOUGLAS N. LETTER
Terrorism Litigation Counsel

10 JOSEPH H. HUNT
Director, Federal Programs Branch

11 VINCENT M. GARVEY
Deputy Branch Director

12 s/ Anthony J. Coppolino
13 ANTHONY J. COPPOLINO
14 Special Litigation Counsel

15 MARCIA BERMAN
16 Trial Attorney
17 U.S. Department of Justice
18 Civil Division, Federal Programs Branch
20 Massachusetts Avenue, NW, Rm. 6102
Washington, D.C. 20001
Phone: (202) 514-4782—Fax: (202) 616-8460

19 *Attorneys for the Government Defendants*

20
21 By: s/ Jon B. Eisenberg per G.O. 45
22 JON B. EISENBERG
23 California Bar No. 88278 (jon@eandhlaw.com)
24 Eisenberg & Hancock LLP
1970 Broadway, Suite 1200 • Oakland, CA 94612
510.452.2581 – Fax 510.452.3277

25 *Counsel for Plaintiffs Al-Haramain Islamic Foundation,*
26 *Inc., Wendell Belew, and Asim Ghafoor*

1 **DECLARATION PURSUANT TO GENERAL ORDER 45, § X.B**

2 I, ANTHONY J. COPPOLINO, hereby declare pursuant to General Order 45, § X.B, that
3 I have obtained the concurrence in the filing of this document from the other signatory listed
4 above (Jon Eisenberg, Plaintiffs’ counsel).

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

6 Executed on July 29, 2010, in the City of Washington, District of Columbia.

7 MICHAEL F. HERTZ
8 Deputy Assistant Attorney General
9 DOUGLAS N. LETTER
10 Terrorism Litigation Counsel
11 JOSEPH H. HUNT
12 Director, Federal Programs Branch
13 VINCENT M. GARVEY
14 Deputy Branch Director
15 ANTHONY J. COPPOLINO
16 Special Litigation Counsel
17 MARCIA BERMAN
18 Trial Attorney

19 By: s/ Anthony J. Coppolino
20 ANTHONY J. COPPOLINO
21 U.S. Department of Justice
22 Civil Division, Federal Programs Branch
23 20 Massachusetts Avenue, NW, Rm. 6102
24 Washington, D.C. 20001
25 Phone: (202) 514-4782—Fax: (202) 616-8460

26 *Attorneys for the Defendants*

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION

4 IN RE NATIONAL SECURITY AGENCY) No. 3:06-md-1791-VRW
5 TELECOMMUNICATIONS RECORDS)
6 LITIGATION)
7 _____)
8 This Document Solely Relates To:) Courtroom: 6, 17th Floor
9 *Al-Haramain Islamic Foundation of Oregon, et*) Chief Judge Vaughn R. Walker
10 *al. v. Obama, et al.* (07-cv-109-VRW))
11 _____)

11 [PROPOSED] ORDER

12 Pursuant to the foregoing stipulation, and good cause appearing, it is hereby ORDERED
13 that the due date for Defendants' response to Plaintiffs' Motion for Attorney Fees (Dkts.
14 738/128) shall be extended from August 4, 2010 to August 5, 2010

15
16 PURSUANT TO STIPULATION, IT IS SO ORDERED.

17
18 _____
19 Hon. Vaughn R. Walker
20 United States District Chief Judge
21
22
23
24
25
26
27
28