

1 ELECTRONIC FRONTIER FOUNDATION
 CINDY COHN (145997)
 2 cindy@eff.org
 LEE TIEN (148216)
 3 tien@eff.org
 KURT OPSAHL (191303)
 4 kurt@eff.org
 KEVIN S. BANKSTON (217026)
 5 bankston@eff.org
 CORYNNE MCSHERRY (221504)
 6 corynne@eff.org
 JAMES S. TYRE (083117)
 7 jstyre@eff.org
 454 Shotwell Street
 8 San Francisco, CA 94110
 Telephone: 415/436-9333
 9 415/436-9993 (fax)

10 Attorneys for Plaintiffs

11 [Additional counsel appear on signature page.]

12

13

UNITED STATES DISTRICT COURT

14

FOR THE NORTHERN DISTRICT OF CALIFORNIA

15

SAN FRANCISCO DIVISION

16 IN RE NATIONAL SECURITY AGENCY)
 TELECOMMUNICATIONS RECORDS)
 17 LITIGATION, MDL No. 1791)

MDL Docket No 06-1791 VRW

CLASS ACTION

18 This Document Relates To:)
 19 ALL CASES)

[PROPOSED] ORDER RESETTING DEADLINES

20)
 21)
 22)
 23)
 24)

Courtroom: 6, 17th Floor
 Judge: The Hon. Vaughn R. Walker

25

26

27

28

1 Upon the oral stipulation of counsel and agreement of the Court reached during the hearing
2 in this case on December 21, 2006, the Court sets the following schedule, superseding the one
3 contained in its Pretrial Order No. 1 (Dkt #79):

4

5 6 7 8 9 10	Master Complaints to be served and filed by Plaintiffs	January 16
11 12 13 14 15	Opposition to Motion for Stay filed and served	January 17
16 17 18 19 20 21	Reply to Motion for Stay filed and served	January 30
22 23 24 25 26 27 28	All parties to SHOW CAUSE in writing why the <i>Hepting</i> order should not apply to all cases and claims to which the government asserts the state secrets privilege	February 1
	Hearing on Stay motion and on the court's ORDER to SHOW CAUSE in writing why the <i>Hepting</i> order should not apply to all cases and claims to which the government asserts the state secrets privilege.	February 9 at 2pm

IT IS SO ORDERED.

Dated _____

The Honorable Vaughn R. Walker
United States District Chief Judge

1 Approval as to form and content:

2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PETER D. KEISLER
Assistant Attorney General, Civil Division
CARL J. NICHOLS
Deputy Assistant Attorney General
DOUGLAS N. LETTER
Terrorism Litigation Counsel
JOSEPH H. HUNT
Director, Federal Programs Branch
ANTHONY J. COPPOLINO
Special Litigation Counsel
ANDREW H. TANNENBAUM
Trial Attorney
U.S. Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Avenue, N.W.
Room 6102
Washington, DC 20001
Telephone: (202) 514-4782
Fax: (202) 616-8460
Email: tony.coppolino@usdoj.gov

By /s/ Anthony J. Coppolino per G.O. 45
Anthony J. Coppolino
Attorneys for United States of America, National Security
Agency, President George W. Bush

PILLSBURY WINTHROP SHAW PITTMAN LLP
BRUCE A. ERICSON
DAVID L. ANDERSON
JACOB R. SORENSEN
MARC H. AXELBAUM
50 Fremont Street
Post Office Box 7880
San Francisco, CA 94120-7880

By /s/ Bruce A. Ericson per G.O. 45
On Behalf of Carriers

1 DATED: December 22, 2006

ELECTRONIC FRONTIER FOUNDATION

2
3 By _____ /s/
4 Cindy A. Cohn, Esq. (SBN 145997)
5 Lee Tien, Esq. (SBN 148216)
6 Kurt Opsahl, Esq. (SBN 191303)
7 Kevin S. Bankston, Esq. (SBN 217026)
8 Corynne McSherry, Esq. (SBN 221504)
9 James S. Tyre, Esq. (SBN 083117)
10 454 Shotwell Street
11 San Francisco, CA 94110
12 Telephone: (415) 436-9333 x108
13 Facsimile: (415) 436-9993

14 ATTORNEYS FOR AT&T CLASS
15 PLAINTIFFS AND CO-CHAIR OF
16 PLAINTIFFS' EXECUTIVE COMMITTEE

17 Additional Plaintiffs' Counsel on Plaintiffs'
18 Executive Committee and Plaintiffs' Liaison
19 Counsel:

20 ROGER BALDWIN FOUNDATION OF
21 ACLU
22 HARVEY GROSSMAN
23 ADAM SCHWARTZ
24 180 North Michigan Avenue
25 Suite 2300
26 Chicago, IL 60601
27 Telephone: (312) 201-9740
28 Facsimile: (312) 201-9760

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
ERIC ALAN ISAACSON
655 West Broadway, Suite 1900
San Diego, CA 92101-3301
Telephone: (619) 231-1058
Facsimile: (619) 231-7423

PLAINTIFFS' COUNSEL FOR AT&T
SUBSCRIBER CLASS AND CO-CHAIR OF
PLAINTIFFS' EXECUTIVE COMMITTEE

ATTORNEYS FOR AT&T CLASS
PLAINTIFFS AND PLAINTIFFS' LIAISON
COUNSEL

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
REED R. KATHREIN
JEFF D. FRIEDMAN
SHANA E. SCARLETT
100 Pine Street, Suite 2600
San Francisco, CA 94111
Telephone: (415) 288-4545
Facsimile: (415) 288-4534

LIEFF, CABRASER, HEIMANN &
BERNSTEIN, LLP
ELIZABETH J. CABRASER
BARRY R. HIMMELSTEIN
MICHAEL W. SOBOL
ERIC B. FASTIFF
275 Battery Street, 30th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-1008

ATTORNEYS FOR AT&T CLASS
PLAINTIFFS AND PLAINTIFFS' LIAISON

PLAINTIFFS' COUNSEL FOR MCI

1 COUNSEL

SUBSCRIBER CLASS

2

3

4 MOTLEY RICE LLC
5 RONALD MOTLEY
6 DONALD MIGLIORI
7 JODI WESTBROOK FLOWERS
8 JUSTIN KAPLAN
9 28 Bridgeside Boulevard
10 P.O. Box 1792
11 Mt. Pleasant, SC 29465
12 Telephone: (843) 216-9163
13 Facsimile: (843) 216-9680

GEORGE & BROTHERS, L.L.P.
R. JAMES GEORGE, JR.
DOUGLAS BROTHERS
1100 Norwood Tower
114 W. 7th Street
Austin, Texas 78701
Telephone: (512) 495-1400
Facsimile: (512) 499-0094

PLAINTIFFS' COUNSEL FOR CINGULAR
SUBSCRIBER CLASS

10 PLAINTIFFS' COUNSEL FOR VERIZON
11 SUBSCRIBER CLASS AND
12 MISCELLANEOUS SUBSCRIBER
13 CLASSES

13 THE MASON LAW FIRM, PC
14 GARY E. MASON
15 NICHOLAS A. MIGLIACCIO
16 1225 19th St., NW, Ste. 500
17 Washington, DC 20036
18 Telephone: (202) 429-2290
19 Facsimile: (202) 429-2294

MAYER LAW GROUP
CARL J. MAYER
66 Witherspoon Street, Suite 414
Princeton, New Jersey 08542
Telephone: (609) 921-8025
Facsimile: (609) 921-6964

PLAINTIFFS' COUNSEL FOR BELLSOUTH
SUBSCRIBER CLASS

18 PLAINTIFFS' COUNSEL FOR SPRINT
19 SUBSCRIBER CLASS

20 BRUCE I AFRAN, ESQ.
21 10 Braeburn Drive
22 Princeton, NJ 08540
23 609-924-2075

LISKA, EXNICIOS & NUNGESSER
ATTORNEYS-AT-LAW
VAL PATRICK EXNICIOS
One Canal Place, Suite 2290
365 Canal Street
New Orleans, LA 70130
Telephone: (504) 410-9611
Facsimile: (504) 410-9937

22 PLAINTIFFS' COUNSEL FOR
23 BELLSOUTH SUBSCRIBER CLASS

PLAINTIFFS' COUNSEL FOR BELLSOUTH
SUBSCRIBER CLASS

24

25

26

27

28

1 KRISLOV & ASSOCIATES, LTD.
2 CLINTON A. KRISLOV
3 W. JOEL VANDER VLIET
4 20 North Wacker Drive
5 Suite 1350
6 Chicago, IL 60606
7 Telephone: (312) 606-0500
8 Facsimile: (312) 606-0207

THE LAW OFFICES OF STEVEN E.
SCHWARZ, ESQ.
STEVEN E. SCHWARZ
2461 W. Foster Ave., #1W
Chicago, IL 60625
Telephone: (773) 837-6134

6 PLAINTIFFS' COUNSEL FOR
7 BELLSOUTH SUBSCRIBER CLASS

PLAINTIFFS' COUNSEL FOR BELLSOUTH
SUBSCRIBER CLASS

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on December 22, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List.

By _____ /s/
Cindy A. Cohn, Esq. (SBN.145997)
ELECTRONIC FRONTIER FOUNDATION
454 Shotwell Street
San Francisco, CA 94110
Telephone: (415) 436-9333 x108
Facsimile: (415) 436-9993
cindy@eff.org