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10 *Attorneys for the Government Defendants*

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

14	IN RE NATIONAL SECURITY AGENCY	)	No. M:06-CV-01791-VRW
15	TELECOMMUNICATIONS RECORDS	)	
16	LITIGATION	)	STIPULATION TO EXTEND
		)	RESPONSE DATE IN
		)	ORDER OF APRIL 17, 2009
17	<u>This Document Solely Relates To:</u>	)	[DKT. 84] AND PROPOSED ORDER
		)	
18	<i>Al-Haramain Islamic Foundation et al.</i>	)	[Civil L.R. 6-1(b); 6-2; 7-12]
	<i>v. Obama, et al.</i> (07-CV-109-VRW)	)	
19		)	Courtroom: 6, 17 th Floor
		)	Judge: Hon. Vaughn R. Walker
20		)	
21		)	

22 Pursuant to Local Rule 6.1(b), the parties, through their undersigned counsel, hereby
23 stipulate to an extension of the response date set forth in the Court's Order of April 17, 2009
24 (Dkt. 84 in 07-cv-109-VRW) from May 8, 2009 to May 15, 2009.

25 **RECITALS**

26 1. On April 17, 2009, the Court issued an order directing the parties to meet and
27 confer regarding the entry of an appropriate protective order in this action concerning classified

28 **Stipulation to Extend Response Date in Order of April 17, 2009 [Dkt. 84]**
Al-Haramain v. Obama (07-cv-109-VRW) (MDL06-cv-1791-VRW)

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1 information and to either submit a stipulated order by May 8, 2009, or, if the parties are
2 unable to agree on all terms, to jointly submit a document containing all agreed terms together
3 with a document setting forth the terms about which they are unable to reach agreement and the
4 respective positions of the parties with regard to each such term. *See* Order, April 17, 2009 (Dkt.
5 84 in 07-cv-109-VRW).

6 2. Plaintiffs forwarded their proposed draft protective order to the Government
7 Defendants on April 24, 2009.

8 3. The Government Defendants require additional time to complete internal
9 deliberations on its position in response to the Court's Order, confer with the plaintiffs regarding
10 the Government's position, and prepare the Government's response under the Order.

11 4. In addition, the undersigned counsel for the Government (Mr. Coppolino) is
12 currently scheduled to be before the Court in San Francisco on May 7, 2009, for a hearing on a
13 separate matter in this MDL proceeding (the Government's motion for summary judgement in
14 actions concerning various state government investigations, *see* Dkt. 536 (Government's motion)
15 and Dkt. 574 (setting hearing for May 7, 2009) in MDL 06-cv-1791-VRW).

16 5. No prior modifications of the response date in the Court's April 17 Order have
17 been sought or entered. L.R. 6-2(a)(2).

18 6. The requested time modification would have no other impact on the schedule of
19 this case. L.R. 6-2(a)(3).

20 **STIPULATION**

21 Pursuant to L.R. 6.1(b), the parties, through their undersigned counsel, hereby stipulate
22 and agree to a one-week extension of the response date set by the Court in its April 17 Order
23 from May 8, 2009 to May 15, 2009.

24 DATED: April 30, 2009

Respectfully Submitted,

25 MICHAEL F. HERTZ
Acting Assistant Attorney General

26 DOUGLAS N. LETTER
Terrorism Litigation Counsel

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10 By: s/ Anthony J. Coppolino
11 Anthony J. Coppolino

12 *Attorneys for the Government Defendants*

~~PROPOSED~~ ORDER

Pursuant to the foregoing Stipulation, and good cause appearing, the Court hereby orders that the response date set forth in the Court's Order of April 17, 2009 [Dkt. 84] shall be and hereby is extended to May 15, 2009.

PURSUANT TO STIPULATION, IT IS SO ORDERED:



Hon. Vaughn R. Walker
United States District Chief Judge