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

14 IN RE NATIONAL SECURITY AGENCY )  
 TELECOMMUNICATIONS RECORDS )  
 15 LITIGATION )  
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 16 This Document Relates Only To: )  
 17 )  
 18 *Center for Constitutional Rights, et al.* )  
*v. Barack Obama, et al.* (07-cv-1115-VRW) )  
 \_\_\_\_\_ )

**No. M:06-cv-01791-VRW**  
**STIPULATION AND REQUEST TO**  
**EXTEND AND MODIFY BRIEFING**  
**SCHEDULE**

Chief Judge Vaughn R. Walker

**RECITALS**

21 1. By order dated March 26, 2010 (Dkt. 720), the Court, upon consideration of the  
 22 parties' joint status report, set a schedule in this action for the submission of cross dispositive  
 23 motions by the parties under which Government Defendants must renew their dispositive motion  
 24 by April 28, 2010; plaintiffs must file an opposition to defendants' renewed motion and renew  
 25 plaintiffs' cross-motion for summary judgment by May 28, 2010; defendants must reply and file  
 26

28 **Stipulation and Request to Extend and Modify Briefing Schedule; Proposed Order**  
*Center for Constitutional Rights, et al. v. Barack Obama, et al.* (07-CV-1115-VRW) (M:06-CV-1791-VRW)

1 an opposition to plaintiffs' cross-motion by June 18, 2010; and plaintiffs may file a cross-reply  
2 by July 9, 2010.

3 2. Subsequently, on March 31, 2010 and April 19, 2010, the Court issued orders in  
4 *Al-Haramain Islamic Foundation of Oregon, Inc. et al. v. Obama, et al.* (07-cv-00109-VRW),  
5 under which the Government Defendants in that action would have submissions to the Court due  
6 on April 30, 2010 and May 21, 2010. *See* Dkts. 721 at 45 and 724 at 1. These deadlines were  
7 not in place when the Government stipulated to a briefing schedule in the *CCR* action.

8 3. Accordingly, at the request of the Government Defendants, the parties in the *CCR*  
9 action have stipulated to a revised briefing schedule and seek the Court's approval for that  
10 revised schedule.

11 4. No hearing date has been scheduled in connection with the parties' forthcoming  
12 submissions in this action and, thus, no change to any date on the Court's calendar would be  
13 necessary if the briefing schedule is revised.

14 **STIPULATION**

15 The parties, through their undersigned counsel, hereby stipulate and agree to the  
16 following revised briefing schedule in this action: (i) the Government Defendants must renew  
17 their dispositive motion by May 27, 2010; (ii) plaintiffs must file an opposition to defendants'  
18 renewed motion and renew plaintiffs' cross-motion for summary judgment by June 24, 2010;  
19 (iii) defendants must reply and file an opposition to plaintiffs' cross-motion by July 15, 2010;  
20 and (iv) plaintiffs may file a cross-reply by August 5, 2010. A proposed order is attached hereto.

21 Respectfully Submitted,

<u><i>For Government Defendants' Position</i></u>	<u><i>For Plaintiffs' Position</i></u>
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28 **Stipulation and Request to Extend and Modify Briefing Schedule; Proposed Order**  
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6 IN RE NATIONAL SECURITY AGENCY ) **No. M:06-cv-01791-VRW**  
7 TELECOMMUNICATIONS RECORDS ) **[PROPOSED] ORDER**  
8 LITIGATION )

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Upon consideration of the parties' stipulation and request to extend and modify the current briefing schedule in this action, and good cause appearing, the Court hereby revises the current briefing schedule set forth in the Court's Order of March 26, 2010 (Dkt. 720) as follows: the Court ORDERS that the parties renew their respective cross-motions according to the following briefing schedule: (i) the Government Defendants must renew their dispositive motion by May 27, 2010; (ii) plaintiffs must file an opposition to defendants' renewed motion and renew plaintiffs' cross-motion for summary judgment by June 24, 2010; (iii) defendants must reply and file an opposition to plaintiffs' cross-motion by July 15, 2010; and (iv) plaintiffs may file a cross-reply by August 5, 2010.

PURSUANT TO STIPULATION, IT IS SO ORDERED,

DATE: \_\_\_\_\_

\_\_\_\_\_  
Chief Judge Vaughn R. Walker

**Stipulation and Request to Extend and Modify Briefing Schedule; Proposed Order**  
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