

1 MICHAEL F. HERTZ
Acting 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 ALEXANDER K. HAAS
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

JON B. EISENBERG, Calif. Bar 88278
Eisenberg and Hancock, LLP
1970 Broadway, Suite 1200
Oakland, CA 94612
510.452.2581 - Fax 510.452.3277

STEVEN GOLDBERG, Oregon Bar 75134
River Park Center, Suite 300
205 SE Spokane St.
Portland, OR 97202
503.445.4622 - Fax 503.238.7501

[FULL COUNSEL LIST BELOW]

10 *Attorneys for the Government Defendants*

Attorneys for the Plaintiffs

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

15 IN RE NATIONAL SECURITY AGENCY)
TELECOMMUNICATIONS RECORDS)
16 LITIGATION)
17 This Document Solely Relates To:)
18 *Al-Haramain Islamic Foundation, Inc., et al.*)
v. Obama, et al. (07-CV-109-VRW))

No. M:06-CV-01791-VRW
**STIPULATION AND REQUEST FOR
BRIEFING SCHEDULE AND
EXTENDED PAGE LIMITS ON
PLAINTIFFS' MOTION
FOR PARTIAL SUMMARY
JUDGMENT**

Honorable Vaughn R. Walker



1 By this stipulation, the parties request the Court to approve the following briefing schedule
2 for plaintiffs' motion for partial summary judgment scheduled for hearing on September 1, 2009:

- 3 • July 10: Plaintiffs' notice of motion and motion.
- 4 • August 5: Government Defendants' opposition.
- 5 • August 19: Plaintiffs' reply

6 Additionally, plaintiffs request an extension of the page limit for their notice of motion and
7 motion to 35 pages, and an extension of the page limit for their reply to 20 pages. The
8 Government Defendants do not object to plaintiffs' requested page limit extension, but request
9 that, if the Court grants plaintiffs' request, it also extend the page limits for the Government
10 Defendants' opposition by an equal amount (i.e. to 35 pages).

11
12 DATED this 16th day of June, 2009.

13
14 I, Jon B. Eisenberg, attest, under penalty of perjury, that concurrence in the filing of this
15 document has been obtained from the other signatory, Anthony J. Coppolino.

16
17
18
19 /s/ Jon B. Eisenberg
Jon B. Eisenberg, Calif. Bar No. 88278

20 **Attorney for the Plaintiffs**

21
22 /s/ Anthony J. Coppolino
Anthony J. Coppolino

23 **Attorney for the Government Defendants**

Plaintiffs' Full Counsel List

1
2 Jon B. Eisenberg, California Bar No. 88278 (jon@eandhlaw.com)
William N. Hancock, California Bar No. 104501 (bill@eandhlaw.com)
3 Eisenberg & Hancock LLP
1970 Broadway, Suite 1200
4 Oakland, CA 94612
510.452.2581 - Fax 510.452.3277

5
6 Steven Goldberg, Oregon Bar No. 75134 (steven@stevengoldberglaw.com)
River Park Center, Suite 300
205 SE Spokane St.
7 Portland, OR 97202
503.445.4622 - Fax 503.238.7501

8
9 Thomas H. Nelson, Oregon Bar No. 78315 (nelson@thnelson.com)
P.O. Box 1211, 24525 E. Welches Road
Welches, OR 97067
10 503.622.3123 - Fax: 503.622.1438

11 Zaha S. Hassan, California Bar No. 184696 (zahahassan@comcast.net)
8101 N.E. Parkway Drive, Suite F-2
12 Vancouver, WA 98662
360.213.9737 - Fax 866.399.5575

13
14 J. Ashlee Albies, Oregon Bar No. 05184 (ashlee@sstcr.com)
Steenson, Schumann, Tewksbury, Creighton and Rose, PC
815 S.W. Second Ave., Suite 500
15 Portland, OR 97204
503.221.1792 - Fax 503.223.1516

16
17 Lisa R. Jaskol, California Bar No. 138769 (ljaskol@earthlink.net)
610 S. Ardmore Ave.
Los Angeles, CA 90005
18 213.385.2977 - Fax 213.385.9089

19 *Attorneys for Plaintiffs Al-Haramain Islamic Foundation, Inc.,*
20 *Wendell Belew and Asim Ghafoor*

CERTIFICATE OF SERVICE

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

**RE: In Re National Security Agency Telecommunications Records Litigation
MDL Docket No. 06-1791 VRW**

I am a citizen of the United States and employed in the County of San Francisco, State of California. I am over eighteen (18) years of age and not a party to the above-entitled action. My business address is Eisenberg and Hancock, LLP, 180 Montgomery Street, Suite 2200, San Francisco, CA, 94104. On the date set forth below, I served the following documents in the manner indicated on the below named parties and/or counsel of record:

- **STIPULATION AND REQUEST FOR BRIEFING SCHEDULE AND EXTENDED PAGE LIMITS ON PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT**

____ **Facsimile** transmission from (415) 544-0201 during normal business hours, complete and without error on the date indicated below, as evidenced by the report issued by the transmitting facsimile machine.

____ **U.S. Mail**, with First Class postage prepaid and deposited in a sealed envelope at San Francisco, California.

XX **By ECF:** I caused the aforementioned documents to be filed via the Electronic Case Filing (ECF) system in the United States District Court for the Northern District of California, on all parties registered for e-filing in In Re National Security Agency Telecommunications Records Litigation, Docket Number M:06-cv-01791 VRW, and *Al-Haramain Islamic Foundation, Inc., et al. v. Bush, et al.*, Docket Number C07-CV-0109-VRW.

I am readily familiar with the firm's practice for the collection and processing of correspondence for mailing with the United States Postal Service, and said correspondence would be deposited with the United States Postal Service at San Francisco, California that same day in the ordinary course of business.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 16, 2009 at San Francisco, California.

/s/ Jessica Dean
JESSICA DEAN