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Attorneys for the Plaintiffs

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

14
15 IN RE NATIONAL SECURITY AGENCY) No. 3:06-md-1791 VRW
TELECOMMUNICATIONS RECORDS)
16 LITIGATION) **STIPULATION AND REQUEST FOR**
) **EXTENSION OF SCHEDULE FOR**
) **BRIEFING ATTORNEY FEES**
17 This Document Solely Relates To:)
) Honorable Vaughn R. Walker
18 *Al-Haramain Islamic Foundation, Inc., et al.*)
v. Obama, et al. (07-CV-109-VRW))
19)
20)
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23 **RECITALS**

24 1. By order dated June 4, 2010 (Dkt. 732), the Court ordered plaintiffs to file their
25 application for attorney fees by June 30, 2010; defendants to file an opposition by July 20, 2010;
26 and plaintiffs to file a reply by July 30, 2010.

27 2. The parties have stipulated to a revised briefing schedule to accommodate

counsels' schedules and seek the Court's approval for that revised schedule.

3. No hearing date has been scheduled in connection with the plaintiffs' forthcoming fee application and, thus, no change to any date on the Court's calendar would be necessary if the briefing schedule is revised.

STIPULATION

The parties, through their undersigned counsel, hereby stipulate and agree to the following revised briefing schedule in this action: (1) plaintiffs' fee application to be filed on or before July 9, 2010; (2) defendants' opposition to plaintiffs' fee application to be filed on or before August 4, 2010; and (3) plaintiffs' reply in support of their fee application to be filed on or before August 16, 2010. A proposed order is attached hereto.

DATED this 14th day of June, 2010.

s/ Jon B. Eisenberg per G.O. 45
Jon B. Eisenberg

Attorney for the Plaintiffs

s/ Marcia Berman
Marcia Berman

Attorney for the Defendants

DECLARATION PURSUANT TO GENERAL ORDER 45, § X.B

1 I, MARCIA BERMAN, hereby declare pursuant to General Order 45, § X.B, that I have
2 obtained the concurrence in the filing of this document from the other signatory listed above (Jon
3 B. Eisenberg, Attorney for Plaintiffs).
4

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

6 Executed on June 14, 2010, in the City of Washington, D.C.

7
8 s/ Marcia Berman
9 MARCIA BERMAN
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28 *Attorney for Defendants*

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

5 IN RE NATIONAL SECURITY AGENCY) No. 3:06-md-1791 VRW
6 TELECOMMUNICATIONS RECORDS) [PROPOSED] ORDER
7 LITIGATION) Chief Judge Vaughn R. Walker
8 This Document Solely Relates To:)
9 *Al-Haramain Islamic Foundation, Inc., et al.*)
10 *v. Obama, et al.* (07-CV-109-VRW))
11)
12)

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14 Upon consideration of the parties' stipulation and request to extend and modify the
15 current briefing schedule in this action, and good cause appearing, the Court hereby revises the
16 current briefing schedule set forth in the Court's Order of June 4, 2010 (Dkt. 732) as follows:
17 the Court ORDERS that: (1) plaintiffs' fee application be filed on or before July 9, 2010; (2)
18 defendants' opposition to plaintiffs' fee application be filed on or before August 4, 2010; and (3)
19 plaintiffs' reply in support of their fee application be filed on or before August 16, 2010.

20 PURSUANT TO STIPULATION, IT IS SO ORDERED,

21 DATE: _____
22 _____
23 Chief Judge Vaughn R. Walker
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