

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

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

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

4. No hearing date has been scheduled in connection with the parties' forthcoming submissions in this action 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: (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. A proposed order is attached hereto.

Respectfully Submitted,

<u>For Government Defendants' Position</u>	<u>For Plaintiffs' Position</u>
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 SHAYANA KADIDAL

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DECLARATION PURSUANT TO GENERAL ORDER 45, § X.B

I, ANTHONY J. COPPOLINO, hereby declare pursuant to General Order 45, § X.B, that I have obtained the concurrence in the filing of this document from the other signatory listed above (Shayana Kadidal, Attorney for Plaintiffs).

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

Executed on April 22, 2010, in the City of Washington, D.C.

By: s/ Anthony J. Coppolino
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Attorney for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE NATIONAL SECURITY AGENCY
 TELECOMMUNICATIONS RECORDS
 LITIGATION

No. M:06-cv-01791-VRW

[PROPOSED] ORDER

Chief Judge Vaughn R. Walker

This Document Relates Only To:

Center for Constitutional Rights, et al.
v. Barack Obama, et al. (07-cv-1115-VRW)

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
Center for Constitutional Rights, et al. v. Barack Obama, et al. (07-CV-1115-VRW) (M:06-CV-1791-VRW)