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14	UNITED STATES D	DISTRICT COURT	
15	NORTHERN DISTRICT OF CALIFORNIA		
16	SAN FRANCISCO DIVISION		
17		MDL Dkt. No. 06-1791-VRW	
18 19	In re: NATIONAL SECURITY AGENCY TELECOMMUNICATIONS RECORDS LITIGATION	STIPULATION RE: BRIEFING SCHEDULE FOR MOTION TO STAY [Dkt. 67-69]; AND [PROPOSED] ORDER	
2021	This Document Relates To:	Courtroom: 6, 17th Floor Judge: Hon. Vaughn R. Walker	
22	ALL CASES		
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1	RECITALS	
2	A.	On November 7, 2006, the Government filed a Motion to Stay MDL
3	Proceedings,	Dkt. 67-69 ("Motion to Stay"). (As in the Joint Case Management Statement,
4	Dkt. 61, "the	Government" refers to the federal defendants sued in their official capacities
5	in these action	ns and the federal intervenor-defendants (United States of America, National
6	Securities Age	ency, President George W. Bush).)
7	B.	On November 17, 2006, the Court set the hearing on the Motion to Stay for
8	February 1, 20	007 at 2 p.m. Pretrial Order No. 1, Dkt. 79, at 2:13-14.
9	C.	Various of the Carriers anticipate filing joinders in the Motion to Stay.
10	D.	Absent adjustment, a briefing schedule set in accordance with the Civil
11	Local Rules w	would cause due dates to fall in the middle of the holidays.
12	E.	The parties wish to avoid inconvenient due dates and also wish to reach
13	agreement on	page limits.
14		STIPULATION
15	Plainti	iffs, through their Co-Lead Coordinating Counsel, the AT&T Defendants, the
16	Verizon Defe	ndants, the BellSouth Defendants and the Sprint Nextel Defendants (these
17	groups of defendants are defined as they are in footnotes 3 through 6 of the Joint Case	
18	Management Statement, Dkt. 61, at 2) (collectively, the "Major Carriers"), through their	
19	respective attorneys of record, and the Government, through their attorneys of record,	
20	hereby stipulate to the following schedule and page limits and request that the Court make	
21	this stipulation an order of the Court:	
22	1.	Any and all joinders in the Motion to Stay (including supporting documents)
23	shall be e-file	d by noon, Pacific time, on Friday, December 22, 2006.
24	2.	The memorandum or memoranda supporting any and all joinders filed by the
25	Major Carrier	s shall collectively not exceed 35 pages.
26	3.	Plaintiffs shall e-file a consolidated opposition to the Motion to Stay and to
27	any and all jo	inders to the Motion to Stay no later than January 10, 2007.
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1	4.	Plaintiffs' consolidated	d opposition shall not exceed in length the sum of
2	(a) the number	er of pages in the Motion	n to Stay (23 pages) plus (b) the collective number of
3	pages in the n	nemoranda supporting a	ny and all joinders filed by the Major Carriers (which,
4	as set forth in	paragraph 2 above, shal	ll not exceed 35 pages) plus (c) the collective number
5	of pages in an	ny memoranda supportin	g any joinder filed by any and all defendants other
6	than the Majo	or Carriers. (Counsel for	defendants other than the Major Carriers have
7	indicated to the	he undersigned that they	are unlikely to be filing any such memoranda.)
8	5.	The Government and t	he Major Carriers shall e-file their replies no later than
9	January 22, 2	007.	
10	Dated	: December 1, 2006.	
11			PETER D. KEISLER
12		(Assistant Attorney General, Civil Division CARL J. NICHOLS
13			Deputy Assistant Attorney General DOUGLAS N. LETTER
14			Terrorism Litigation Counsel JOSEPH H. HUNT
15			Director, Federal Programs Branch ANTHONY J. COPPOLINO
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22			By /s/Anthony J. Coppolino per G.O. 45
23			Anthony J. Coppolino Attorneys for United States of America, National
24			Security Agency, President George W. Bush
25	//		
25 26	//		
27	//		
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1	DECLARATION PURSUANT TO GENERAL ORDER 45, § X.B	
2	I, BRUCE A. ERICSON, hereby declare pursuant to General Order 45, § X.B, that I	
3	have obtained the concurrence in the filing of this document from each of the other	
4	signatories listed above and below.	
5	I declare under penalty of perjury that the foregoing declaration is true and correct.	
6	Executed on December 1, 2006, at San Francisco, California.	
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17	Defendants	
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19	LEE TIEN (148216) KURT OPSAHL (191303)	
20	KEVIN S. BANKSTON (217026) CORYNNE MCSHERRY (221504)	
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26		
27	By <u>/s/ Cindy Cohn per G.O. 45</u> Cindy Cohn Co-Lead Coordinating Counsel for Plaintiffs	
28	Co-Lead Cooldinating Counsel for Flaminis	

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1	[PROPOSED] ORDER
2	Pursuant to the foregoing stipulation, and good cause appearing,
3	IT IS SO ORDERED.
4	Dated: December, 2006.
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6	Hon Voucha D. Wollron
7	Hon. Vaughn R. Walker United States District Chief Judge
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