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

14 _____
IN RE NATIONAL SECURITY AGENCY
15 TELECOMMUNICATIONS RECORDS
LITIGATION
16 _____

No. M:06-cv-01791-VRW

Judge: Hon. Vaughn R. Walker

17 This Document Relates Only to:
18 *Center for Constitutional Rights v. Bush,*
(Case No. 07-1115)
19 _____

20 **RECITALS**

21
22 By Order dated January 20, 2010 (dkt. 702 in M:06-cv-1791, dkt. 31 in 3:07-cv-1115), this
23 Court ordered the parties to submit “on or before February 26, 2010, a joint status report advising
24 the court of the status of this case, what proceedings are necessary to resolve it and proposing a
25 tentative schedule for such proceedings.” Plaintiffs and Defendants, through counsel, hereby
26 stipulate that the time for submission of the requested joint status report and proposed schedule be
27 enlarged through March 9, 2010, and request that the Court make this stipulation an order of the
28 Court.

1 The enlargement of time is necessary to accommodate other litigation burdens on Plaintiffs’
2 counsel, particularly a variety of pre- and post-oral argument responsibilities in *Holder v.*
3 *Humanitarian Law Project*, Nos. 08-1498, 09-89, to be argued at the Supreme Court on February
4 23, 2010, and supplemental and reply briefing in *Kiyemba v. Obama*, No. 08-1234, to be argued at
5 the Supreme Court on March 23, 2010.

6 There have been no previous time modifications relating to the aforementioned Order. No
7 prejudice will result from the requested enlargement of time and, as there are no further deadlines
8 scheduled in the case, it will not affect the schedule for the case.

9 **STIPULATION**

10 Plaintiffs and Defendants, through counsel, hereby stipulate that the time for submission of
11 the requested joint status report and proposed schedule be enlarged through March 9, 2010, and
12 request that the Court make this stipulation an order of the Court.

13
14 Respectfully submitted,

15
16 By: /s/Shayana Kadidal
17 Shayana Kadidal
18 Michael Ratner
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Attorneys for Defendants

February 18, 2010

DECLARATION PURSUANT TO GENERAL ORDER 45, § X.B

I, SHAYANA KADIDAL, 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 below.

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

Executed on February 18, 2010, in the City of New York, New York.

/s/Shayana Kadidal

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By: /s/ Anthony J. Coppolino per G.O. 45

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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

Judge: Hon. Vaughn R. Walker

This Document Relates Only to:
Center for Constitutional Rights v. Bush,
(Case No. 07-1115)

[PROPOSED] ORDER

The stipulation for an enlargement of time to submit the joint status report and proposed schedule previously ordered by the Court, *see* Order dated January 20, 2010 (Dkt. 702), shall be and hereby is GRANTED, and the required joint status report and proposed schedule shall be due by no later than March 9, 2010.

PURSUANT TO STIPULATION, IT IS SO ORDERED,

DATE: _____

Chief Judge Vaughn R. Walker

