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14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17 In re:
18 NATIONAL SECURITY AGENCY
19 TELECOMMUNICATIONS RECORDS
20 LITIGATION
21 This Document Relates To:
22 ALL CASES
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MDL Dkt. No. 06-1791-VRW
**STIPULATION RE: BRIEFING
SCHEDULE FOR MOTION TO STAY
[Dkt. 67-69]; AND [PROPOSED] ORDER**

Courtroom: 6, 17th Floor
Judge: Hon. Vaughn R. Walker

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RECITALS

A. On November 7, 2006, the Government filed a Motion to Stay MDL Proceedings, Dkt. 67-69 (“Motion to Stay”). (As in the Joint Case Management Statement, Dkt. 61, “the Government” refers to the federal defendants sued in their official capacities in these actions and the federal intervenor-defendants (United States of America, National Securities Agency, President George W. Bush).)

B. On November 17, 2006, the Court set the hearing on the Motion to Stay for February 1, 2007 at 2 p.m. Pretrial Order No. 1, Dkt. 79, at 2:13-14.

C. Various of the Carriers anticipate filing joinders in the Motion to Stay.

D. Absent adjustment, a briefing schedule set in accordance with the Civil Local Rules would cause due dates to fall in the middle of the holidays.

E. The parties wish to avoid inconvenient due dates and also wish to reach agreement on page limits.

STIPULATION

Plaintiffs, through their Co-Lead Coordinating Counsel, the AT&T Defendants, the Verizon Defendants, the BellSouth Defendants and the Sprint Nextel Defendants (these groups of defendants are defined as they are in footnotes 3 through 6 of the Joint Case Management Statement, Dkt. 61, at 2) (collectively, the “Major Carriers”), through their respective attorneys of record, and the Government, through their attorneys of record, hereby stipulate to the following schedule and page limits and request that the Court make this stipulation an order of the Court:

1. Any and all joinders in the Motion to Stay (including supporting documents) shall be e-filed by noon, Pacific time, on Friday, December 22, 2006.

2. The memorandum or memoranda supporting any and all joinders filed by the Major Carriers shall collectively not exceed 35 pages.

3. Plaintiffs shall e-file a consolidated opposition to the Motion to Stay and to any and all joinders to the Motion to Stay no later than January 10, 2007.

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[PROPOSED] ORDER

Pursuant to the foregoing stipulation, and good cause appearing,

IT IS SO ORDERED.

Dated: December __, 2006.

Hon. Vaughn R. Walker
United States District Chief Judge