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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

CAROLYN JEWEL, TASH HEPTING,
YOUNG BOON HICKS, as executrix of the
estate of GREGORY HICKS, ERIK KNUTZEN
and JOICE WALTON, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

NATIONAL SECURITY AGENCY, *et al.*,

Defendants.

) Case No.: 4:08-cv-4373-JSW
)
)
) **STIPULATION AND ~~PROPOSED~~**
) **ORDER TO EXTEND BRIEFING**
) **SCHEDULE FOR PARTIAL SUMMARY**
) **JUDGMENT MOTION**
)
) Fed. R. Civ. P. 6(b)(1) & Civil L.R. 6-2
)
) Courtroom 5, 2nd Floor
) The Honorable Jeffrey S. White

Pursuant to Fed. R. Civ. P. 6(b)(1) and Civil L.R. 6-2, plaintiffs request and the parties, by and through undersigned counsel, have conferred and hereby stipulate to and respectfully request the Court set the following briefing schedule for the plaintiffs’ motion for partial summary judgment (ECF No. 261), filed on July 25, 2014. Because of the significant nature of the issues raised, the parties have agreed, subject to the approval of the Court, to allow each other additional time in excess of the Local Rules, for response and reply. The parties propose the following schedule:

Government Defendants’ Response: September 19, 2014

Plaintiffs’ Reply: October 17, 2014.

Plaintiffs have set the hearing date for their motion as October 31, 2014. The Government Defendants object to a hearing date being set at this time, for reasons that will be explained in their response to the motion.

DATE: July 29, 2014

Respectfully submitted,

/s/ Cindy Cohn

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Dated: July 29, 2014

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DECLARATION PURSUANT TO LOCAL RULE 5-1

I, Cindy Cohn, hereby declare pursuant to Local Rule 5-1 that I have obtained Defendants' concurrence in the filing of this document from Marcia Berman, Counsel for Defendants.

Executed on July 29, 2014, in San Francisco, California.

/s/ Cindy Cohn
Cindy Cohn

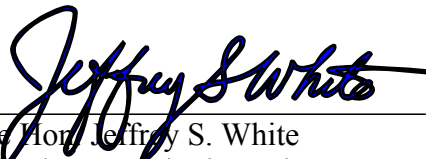
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PURSUANT TO STIPULATION, it is hereby ORDERED that the briefing schedule on Plaintiffs' Motion for Partial Summary Judgment shall be in accordance with the parties' Stipulation.

IT IS SO ORDERED.

Dated: August 4, 2014



The Hon. Jeffrey S. White
United States District Judge