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[Counsel listed on following page.]

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. 08-CV-4373-JSW

**STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND TIME TO FILE  
PLAINTIFFS' EVIDENCE  
PRESERVATION 2017 UPDATE BRIEF  
REPLY**

No hearing scheduled

Courtroom 5, Second Floor  
The Honorable Jeffrey S. White

1 CINDY COHN (SBN 145997)  
cindy@eff.org  
2 DAVID GREENE (SBN 160107)  
LEE TIEN (SBN 148216)  
3 KURT OPSAHL (SBN 191303)  
JAMES S. TYRE (SBN 083117)  
4 MARK RUMOLD (SBN 279060)  
ANDREW CROCKER (SBN 291596)  
5 JAMIE L. WILLIAMS (SBN 279046)  
ELECTRONIC FRONTIER FOUNDATION  
6 815 Eddy Street  
San Francisco, CA 94109  
7 Telephone: (415) 436-9333  
Fax: (415) 436-9993  
8

RICHARD R. WIEBE (SBN 121156)  
wiebe@pacbell.net  
9 LAW OFFICE OF RICHARD R. WIEBE  
44 Montgomery Street, Suite 650  
10 San Francisco, CA 94104  
Telephone: (415) 433-3200  
11 Fax: (415) 433-6382  
12

RACHAEL E. MENY (SBN 178514)  
rmeny@keker.com  
13 MICHAEL S. KWUN (SBN 198945)  
BENJAMIN W. BERKOWITZ (SBN 244441)  
14 JUSTINA K. SESSIONS (SBN 270914)  
PHILIP J. TASSIN (SBN 287787)  
15 KEKER, VAN NEST & PETERS, LLP  
633 Battery Street  
16 San Francisco, CA 94111  
Telephone: (415) 391-5400  
17 Fax: (415) 397-7188  
18

THOMAS E. MOORE III (SBN 115107)  
tmoore@rroyselaw.com  
19 ROYSE LAW FIRM, PC  
149 Commonwealth Drive, Suite 1001  
20 Menlo Park, CA 94025  
Telephone: (650) 813-9700  
21 Fax: (650) 813-9777  
22

ARAM ANTARAMIAN (SBN 239070)  
antaramian@sonic.net  
23 LAW OFFICE OF ARAM ANTARAMIAN  
1714 Blake Street  
24 Berkeley, CA 94703  
Telephone: (510) 289-1626  
25

26 *Counsel for Plaintiffs*  
27  
28

1 Pursuant to Civil L.R. 6-2, the parties, through their undersigned counsel, hereby stipulate  
2 and respectfully request the Court to extend by one business day the deadline for the Plaintiffs'  
3 response submission regarding evidence preservation.

4 **RECITALS**

5 2. On June 12, 2017 this Court approved a briefing schedule different from the one originally  
6 ordered by the Court, adjusted to provide for staggered, rather than simultaneous briefing, with a  
7 two business day extension for the due date of the Government defendants' opening brief.

8 3. The parties have conferred regarding this matter, and, with the exception of the Plaintiffs'  
9 response submission, the modification proposed by the parties would not otherwise affect the  
10 schedule for this case.

11 4. The parties stipulate that the Plaintiffs' response submission due date be extended by one  
12 business day, to account for Plaintiffs' counsel EFF's office closure on July 3, 2017, due to the  
13 federal holiday.

14 **STIPULATION**

15 Pursuant to Local Rule 6-2 the parties hereby respectfully request that the briefing schedule  
16 be adjusted with a one business day extension for the due date of the Plaintiffs' response  
17 submission. Specifically, the parties stipulate that the Plaintiffs' response submission will be due  
18 July 5, 2017.

19 DATE: June 30, 2017

Respectfully submitted,

20 CHAD A. READLER  
21 Acting Assistant Attorney General

s/ Cindy Cohn

22 ANTHONY J. COPPOLINO  
23 Deputy Branch Director

CINDY COHN  
DAVID GREENE  
LEE TIEN  
KURT OPSAHL  
JAMES S. TYRE  
MARK RUMOLD  
ANDREW CROCKER  
JAMIE L. WILLIAMS  
ELECTRONIC FRONTIER FOUNDATION

24 By: /s/ James J. Gilligan  
25 JAMES J. GILLIGAN  
Special Litigation Counsel

26 RODNEY PATTON  
Senior Counsel

RICHARD R. WIEBE  
LAW OFFICE OF RICHARD R. WIEBE

1 JULIA A. BERMAN  
2 TIMOTHY A. JOHNSON  
3 CAROLINE J. ANDERSON  
4 Trial Attorneys  
5 U.S. Department of Justice  
6 Civil Division, Federal Programs Branch  
7 20 Massachusetts Avenue, N.W., Room  
8 7320  
9 Washington, D.C. 20001  
10 E-mail: james.gilligan@usdoj.gov  
11 Phone: (202) 514-3358  
12 Fax: (202) 616-8470

THOMAS E. MOORE III  
ROYSE LAW FIRM, PC  
  
RACHAEL E. MENY  
MICHAEL S. KWUN  
BENJAMIN W. BERKOWITZ  
PHILIP J. TASSIN  
KEKER & VAN NEST LLP  
  
ARAM ANTARAMIAN  
LAW OFFICE OF ARAM ANTARAMIAN  
  
*Attorneys for Plaintiffs*

*Attorneys for the Government Defendants  
Sued in their Official Capacities*

**DECLARATION PURSUANT TO CIVIL L.R. 5-1 AND 6-2**

I, Cindy Cohn, hereby declare pursuant to Local Rule 5-1 that I have obtained Defendants' concurrence in the filing of this document from James J. Gilligan, counsel for the Government Defendants, and (2) pursuant to Civil L.R. 6-2, that the reasons given above for the enlargement of time requested herein are true and correct.

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

Executed on June 30, 2017, in San Francisco, California.

By: /s/ Cindy Cohn  
CINDY COHN

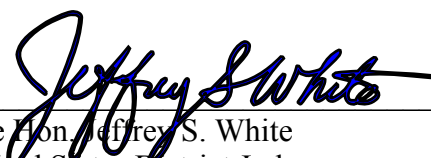
*Counsel for Plaintiffs*

\* \* \* \* \*

**~~PROPOSED~~ ORDER**

PURSUANT TO STIPULATION, IT IS ORDERED that (1) the deadline to file the Plaintiffs' response regarding Evidence Preservation is extended from July 3 to July 5, 2017.

Date: June 30, 2017

  
The Hon. Jeffrey S. White  
United States District Judge