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17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **OAKLAND DIVISION**

20 FIRST UNITARIAN CHURCH OF LOS)
ANGELES, *et al.*,)
21 Plaintiffs,)
22 v.)
23 NATIONAL SECURITY AGENCY, *et al.*,)
24 Defendants.)

Case No: 4:13-cv-03287 JSW

**STIPULATION AND
[PROPOSED] ORDER**

Courtroom 5, 2nd Floor
The Honorable Jeffrey S. White

1 THE FOLLOWING PARTIES, BY AND THROUGH THEIR RESPECTIVE
2 COUNSEL, HEREBY STIPULATE:

3 1. Subject to the Court adopting Paragraph 2 of this Stipulation in full, defendants
4 Admiral Michael S. Rogers, Eric H. Holder, John P. Carlin, James B. Comey and James R.
5 Clapper, only insofar as they are sued in their individual capacity, through their undersigned
6 counsel, accept service of summons and Plaintiffs' Second Amended Complaint in their personal
7 capacity, waive timely service of a summons, and agree they will not challenge the adequacy or
8 timeliness of service.

9 2. No answer or other response to the Second Amended Complaint will be due from
10 these defendants to the extent they are sued in their individual capacity until 30 days after the
11 filing of the Court's decision on the Government Defendants' currently pending motion to
12 dismiss (ECF No. 66).

13
14 Dated: January 30, 2015

Respectfully submitted,

15 *s/ Richard R. Wiebe* _____

16 RICHARD R. WIEBE

LAW OFFICE OF RICHARD R. WIEBE

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ARAM ANTARAMIAN
LAW OFFICE OF ARAM ANTARAMIAN

Counsel for Plaintiffs

Dated: January 30, 2015

/s James R. Whitman
James R. Whitman
Trial Attorney
U.S. Department of Justice
Civil Division, Torts Branch
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1425 New York Ave., N.W.
Washington, DC 20005

*Counsel for Michael S. Rogers, Eric H. Holder,
John P. Carlin, James B. Comey, and James R.
Clapper, only insofar as they are sued in their
individual capacity*

DECLARATION PURSUANT TO LOCAL RULE 5-1

I, Richard R. Wiebe, hereby declare pursuant to Local Rule 5-1 that Plaintiffs have obtained the concurrence of James R. Whitman, counsel to the Individual Capacity Defendants, in the filing of this document.

Executed on January 30, 2015, in San Francisco, California.

s/ Richard R. Wiebe
Richard R. Wiebe

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~~PROPOSED~~ ORDER

Pursuant to stipulation, it is ordered that the time for Individual Capacity Defendants Admiral Michael S. Rogers, Eric H. Holder, John P. Carlin, James B. Comey, and James R. Clapper to answer or otherwise respond to Plaintiffs' Second Amended Complaint is extended to 30 days after the filing of the Court's decision on the Government Defendants' currently pending motion to dismiss (ECF No. 66).

IT IS SO ORDERED.

Dated: February 2, 2015


JEFFREY S. WHITE
UNITED STATES DISTRICT JUDGE