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16 Attorneys for Plaintiffs

17 **UNITED STATES DISTRICT COURT**  
18 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
19 **SAN FRANCISCO DIVISION**

20 CAROLYN JEWEL, TASH HEPTING, )  
21 YOUNG BOON HICKS, as executrix of the )  
22 estate of GREGORY HICKS, ERIK KNUTZEN )  
23 and JOICE WALTON, on behalf of themselves )  
24 and all others similarly situated, )  
Plaintiffs, )  
25 v. )  
26 NATIONAL SECURITY AGENCY, *et al.*, )  
27 Defendants. )

Case No.: 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 11, 19th Floor  
The Honorable Jeffrey S. White

1 Pursuant to Fed. R. Civ. P. 6(b)(1) and Civil L.R. 6-2, plaintiffs request and the parties, by  
2 and through undersigned counsel, have conferred and hereby stipulate to and respectfully request  
3 the Court extend the briefing schedule on the plaintiffs' motion for partial summary judgment.  
4 Plaintiffs have requested this extension in light of the ongoing public revelations and discussions  
5 about issues raised by the motion, and Defendants have graciously agreed to allow them more time  
6 to prepare the motion. Plaintiffs propose that the schedule change as follows:

7 Plaintiffs' Motion for Partial Summary Judgment:

8 Currently due: **January 31, 2014** Proposed new due date: **February 21, 2014**

9 Defendants' Opposition to Plaintiffs' Motion for Partial Summary Judgment:

10 Currently due: **February 14, 2014** Proposed new due date: **March 21, 2014**

11 Plaintiffs' Reply in Support of Motion for Partial Summary Judgment:

12 Currently due: **February 28, 2014** Proposed new due date: **April 11, 2014.**

13 The other briefing schedule in *Jewel v. NSA*, on the four questions posed by this Court at  
14 the September 27, 2013 Case Management Conference (ECF No. 164 at 5:19 to 7:8) will remain  
15 unchanged as it was set by the Court at the Case Management Conference: The government filed  
16 its opening brief on December 20, 2013; Plaintiffs filed their response to defendants' public  
17 declarations on January 10, 2014; on Jan. 31, Plaintiffs will file their opposition on questions 1, 2,  
18 and 4 and their opening brief on question 3; on February 14, the government will file its opposition  
19 on question 3; and on February 28, plaintiffs will file their reply on question 3 and the government  
20 will file its reply on questions 1, 2, and 4.

21 The court has not set a hearing date for any of these matters.

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*Counsel for the Government Defendants*

\* \* \* \* \*

**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 January 28, 2014, in San Francisco, California.

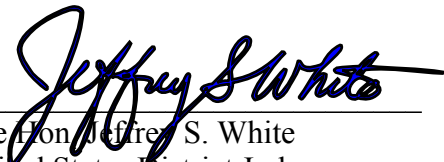
/s/ Cindy Cohn  
Cindy Cohn

\* \* \* \* \*

PURSUANT TO STIPULATION, it is 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: January 29, 2014

  
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The Hon. Jeffrey S. White  
United States District Judge