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

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

Case No: 3:13-cv-03287 JSW
**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND BRIEFING
 SCHEDULE FOR PARTIES' CROSS
 MOTIONS FOR PARTIAL
 SUMMARY JUDGMENT AND TO
 DISMISS**
 Date: April 25, 2014
 Time: 9:00 a.m.
 Hon. Jeffrey S. White
 Courtroom 11 - 19th Floor

1 Pursuant to Fed. R. Civ. P. 6(b)(1) and Civil L.R. 6-2, the parties, by and through
2 undersigned counsel, have conferred and hereby stipulate to and respectfully request the Court
3 extend the briefing schedule on the parties' cross-motions for partial summary judgment and to
4 dismiss the action, as follows:

5 Plaintiffs' MSJ Reply and Opposition to Defendants' Motion to Dismiss:

6 Currently due: **January 10, 2014** Proposed new due date: **January 24, 2014**

7 Defendants' Motion to Dismiss Reply:

8 Currently due: **January 24, 2014** Proposed new due date: **February 21, 2014.**

9 This extension is requested in order to allow the parties more time to fully brief the
10 numerous issues in this case, especially in light of the recent decision by the District Court for
11 the District of Columbia in *Klayman v. Obama*, ___ F.Supp.2d ___, 2013 WL 6571596 (Dec.
12 16, 2013), to take into account the briefing schedule set in *Jewel v. NSA*, as well as the other
13 commitments of counsel and the travel and holiday vacation schedules of counsel and their
14 families.

15 There have been no previous requests to alter the briefing schedule and this requested
16 change should not impact the schedule of this case. The hearing on this matter is scheduled for
17 April 25, 2014.

18
19 DATED: December 19, 2013

Respectfully submitted,

20 _____
/s/ Cindy Cohn

21 Cindy Cohn
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Counsel for Plaintiffs

DATED: December 19, 2013

Respectfully submitted,

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

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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 Defendant's concurrence in the filing of this document from Marcia Berman, Counsel for Defendants.

Executed on December 19, 2013, in San Francisco, California.

/s/ Cindy Cohn
Cindy Cohn

* * * * *

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

The Hon. Jeffrey S. White
United States District Judge