	Case 4:09-cv-00037-CW	Document 590	Filed 12/16/16	Page 1 of 4
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Counsel	for Plaintiffs Listed on Signa	ture Page		
	UNITED	STATES DISTR	ICT COURT	
	NORTHER	N DISTRICT OF	CALIFORNIA	
	C	OAKLAND DIVIS	SION	
VIETN	AM VETERANS OF AMER	ICA, et al.,	Case No. CV 09-0)037-CW (EDL)
	Plainti	ffs.		
			STIPULATION	
	V.		ENLARGE INJU BRIEFING DEA	
CENTI	RAL INTELLIGENCE AGEN	NCY, et al.,	[PROPOSED] O	RDER
	Defen	dants.		
F	Pursuant to Federal Rule of Ci	vil Procedure 6(b)	(1) and Civil Loca	al Rule 6-2, the part

by and through undersigned counsel, hereby respectfully move to enlarge the Court's deadlines for further briefing regarding the medical care injunction. In accordance with Civil L.R. 6-2(a), this stipulation is supported by the Declaration of Susan Ullman filed herewith, and is filed with the proposed order below.

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On December 7, 2016, the Court issued an Order providing Plaintiffs with the opportunity to respond within two weeks to the Army's plan as the Court proposed to modify it, and providing for the Army to respond within two weeks after Plaintiffs' filed their response. *See* ECF No. 588.

The Court's briefing schedule spans holidays and vacation weeks for counsel and clients. Accordingly, the parties jointly request an extension to the Court's injunction briefing deadlines as follows, and submit that there is good cause for the requested enlargement of time:

- Extend Plaintiffs' deadline to submit a response to the Army's plan as the Court proposes to modify it from December 21, 2016 to January 11, 2016;

Extend the Army's deadline to respond from January 4, 2017 to February 9, 2017.

There have been thirty-three previous time modifications in this case. Because the Court has not set any other deadlines in this case, the requested enlargements of time will not otherwise affect the case schedule.

NO. C 09-37 CW STIPULATION TO ENLARGE INJUNCTION BRIEFING DEADLINES AND [PROPOSED] ORDER

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1 Dated: December 14, 2016 2 3 4 5 6 /s/ Grant C. Schrader 7 JAMES P. BENNETT (CA SBN 65179) 8 JBennett@mofo.com STACEY M. SPRENKEL (CA SBN 241689) 9 SSprenkel@mofo.com BEN PATTERSON (CA SBN 268696) 10 BPatterson@mofo.com 11 GRANT C. SCHRADER (CA SBN 273498) GSchrader@mofo.com 12 MORRISON & FOERSTER LLP 425 Market Street 13 San Francisco, California 94105-2482 Telephone: 415.268.7000 14 Facsimile: 415.268.7522 15 Attorneys for Plaintiffs 16 17 18 19 20 21 22

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Respectfully submitted,

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<u>/s/ Susan K. Ullman</u> SUSAN K. ULLMAN District of Columbia Bar No. 426874 Senior Trial Counsel U.S. Department of Justice Civil Division, Federal Programs Branch 20 Massachusetts Ave., NW Washington, D.C. 20530 Telephone: (202) 616-0680 Facsimile: (202) 616-8470 E-mail: susan.ullman@usdoj.gov

Attorneys for Defendants

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1	PURSUANT TO STIPULATION, IT IS SO ORDERED.
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3	Dated: <u>December 16, 2016</u> The Ho Gudia Wilken
4	United States District Court
5	for the Northern District of California
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	NO. C 09-37 CW STIPULATION TO ENLARGE INJUNCTION BRIEFING DEADLINES AND [PROPOSED] ORDER