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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

VIETNAM VETERANS OF AMERICA
et al.,

Plaintiffs,

v.

CENTRAL INTELLIGENCE AGENCY
et al.,

Defendants.

Case No. CV 09-0037-CW

**STIPULATION TO ENLARGE
 INJUNCTION SUBMISSION
 DEADLINES AND [PROPOSED]
 ORDER**

Complaint filed January 7, 2009

1 Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Civil Local Rule 6-2, the parties,
 2 by and through undersigned counsel, hereby respectfully move to enlarge the Court's medical
 3 care injunction submission deadlines, as explained below. In accordance with Civil L.R. 6-2(a),
 4 this stipulation is supported by the Declaration of Ben Patterson ("Patterson Decl."), filed
 5 herewith, and is filed with the proposed order below.

6 On January 26, 2016, the Ninth Circuit issued an amended opinion that reversed the
 7 Court's denial of injunctive relief compelling the provision of medical care by the Army.
 8 (Docket No. 570.) On February 8, 2016, the Court ordered the parties to meet and confer
 9 regarding the Ninth Circuit's opinion and to submit either a stipulated injunction by March 7,
 10 2016, or competing proposed injunctions along with a brief from each party supporting their
 11 respective proposal by March 14, 2016. (Docket No. 572.)

12 The parties have begun the meet and confer process, but believe an extension of the
 13 Court's deadlines would facilitate the parties' efforts to fashion an appropriate injunction or
 14 potentially to resolve the case through a settlement. (Patterson Decl. ¶ 3.) Accordingly, the
 15 parties jointly request an extension to the Court's injunction submission deadlines as follows, and
 16 submit that there is good cause for the requested enlargement of time.

| Event | Current Deadline | Proposed Deadline |
|--|------------------|-------------------|
| Deadline to submit a stipulated medical care injunction | March 7, 2016 | April 20, 2016 |
| Deadline to submit competing proposed injunctions and supporting briefs (if necessary) | March 14, 2016 | April 27, 2016 |

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 22 There have been twenty-seven previous time modifications in this case. (*See* Docket No.
 23 554-1 ¶ 4; Docket No. 555.) Because the Court has not set any other deadlines in this case, the
 24 requested enlargements of time will not otherwise affect the case schedule.

25
 26 Respectfully submitted,

27 Dated: February 26, 2016

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PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: February 29, 2016



The Honorable Claudia Wilken
United States District Court for the Northern
District of California

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Attestation Pursuant to Civil Local Rule 5-1

I, Ben Patterson, am the ECF User whose ID and password are being used to file this document. I hereby attest that Susan K. Ullman concurs in this filing.

/s/Ben Patterson
Ben Patterson