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7 Attorneys for Plaintiffs
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 8 Rights Organization; Bruce Price; Franklin D. Rochelle; Larry
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 9 and William Blazinski

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA

12 VIETNAM VETERANS OF AMERICA, *et*
 13 *al.*,

14 Plaintiffs,

15 v.

16 CENTRAL INTELLIGENCE AGENCY, *et*
 17 *al.*,

18 Defendants.

Case No. CV 09-0037-CW

**PLAINTIFFS' REPLY IN SUPPORT OF
 MOTION TO EXTEND DISCOVERY OF
 CIA**

Hearing Date: September 22, 2011
 Time: 2:00 p.m.
 Courtroom: E, 15th Floor
 Judge: Hon. Jacqueline Scott Corley

Complaint filed January 7, 2009

1 Plaintiffs filed their Motion to Extend Discovery of CIA (Docket No. 260) on
2 August 18, 2011, explaining that this relief was warranted by the Central Intelligence Agency's
3 ("CIA") serial non-compliance with its discovery obligations. Plaintiffs requested that the Court
4 extend discovery of Defendant CIA until 30 days following the CIA's compliance with all
5 outstanding discovery obligations, including any discovery compelled by the Court's resolution
6 of Plaintiffs' August 18, 2011 Motion to Compel (Docket No. 258). (*See* Docket No. 260.)
7 Defendants filed their Response (Docket No. 277) on September 1, 2011. Defendants
8 acknowledge that an extension of discovery of the CIA is warranted. (*See id.*) Accordingly, the
9 Court should grant Plaintiffs' requested relief by ordering that fact discovery of the CIA be
10 permitted to continue until 30 days following the CIA's compliance with all outstanding
11 discovery obligations, including any discovery compelled by the Court's resolution of Plaintiffs'
12 August 18, 2011 Motion to Compel.¹

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14 Dated: September 8, 2011

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25 _____
26 ¹ Due to delays in Defendants' production of documents and the pending motions to compel, the
27 current discovery deadlines governing this case likely will have to be extended. Plaintiffs have
28 requested that Defendants provide updated information about the timing for the completion of
Defendants' document productions and are hopeful that the parties can agree to an appropriate
modification of the current case schedule.