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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.) The parties promptly began the meet
 12 and confer process, but have sought extensions of the deadlines to submit injunctions in order to
 13 allow further time for the parties to attempt to fashion an appropriate injunction or to potentially
 14 resolve the case through a settlement, which the Court has granted. (Docket Nos. 575, 577, 579.)

15 The parties participated in a mediation on June 28, 2016, in the District of Columbia with
 16 mediator Thomas J. Perrelli. (Patterson Decl. ¶ 2.) The parties have tentatively scheduled a
 17 second mediation session for August 2, 2016, and believe an extension of the Court's deadlines
 18 would facilitate the parties' efforts to potentially resolve the case through a settlement or to agree
 19 on a proposed injunction. (*Id.*) Accordingly, the parties jointly request an extension to the
 20 Court's injunction submission deadlines as follows, and submit that there is good cause for the
 21 requested enlargement of time.

Event	Current Deadline	Proposed Deadline
Deadline to submit a stipulated medical care injunction	July 13, 2016	August 12, 2016
Deadline to submit competing proposed injunctions and supporting briefs (if necessary)	July 20, 2016	September 2, 2016

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

4
5 Respectfully submitted,

6 Dated: July 14, 2016

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11 Principal Deputy Assistant Attorney General
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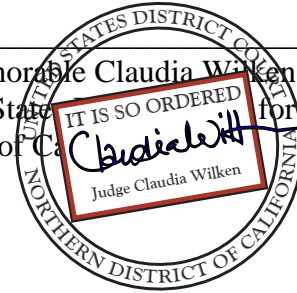
Attorneys for Plaintiffs

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PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: July 18, 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