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12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA
 14 OAKLAND DIVISION

15 VIETNAM VETERANS OF AMERICA, et al.,
 16
 Plaintiffs,
 17
 v.
 18
 CENTRAL INTELLIGENCE AGENCY, et al.,
 19
 Defendants.
 20

Case No. CV 09-0037-CW (EDL)

**STIPULATION TO
 ENLARGE INJUNCTION
 SUBMISSION DEADLINES AND
 21 ~~PROPOSED~~ ORDER**

22 Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Civil Local Rule 6-2, the parties,
 23 by and through undersigned counsel, hereby respectfully move to enlarge the Court’s medical
 24 care injunction submission deadlines, as set forth below. In accordance with Civil L.R. 6-2(a),
 25 this stipulation is supported by the Declaration of Susan Ullman (“Ullman Decl.”), filed
 26 herewith, and is filed with the proposed order below.

1 On January 26, 2016, the Ninth Circuit issued an amended opinion that reversed the
2 Court's denial of injunctive relief compelling the provision of medical care by the Army.
3 See ECF No. 570. On February 8, 2016, the Court ordered the parties to meet and confer
4 regarding the Ninth Circuit's opinion and to submit either a stipulated injunction by March 7,
5 2016, or competing proposed injunctions along with a brief from each party supporting its
6 respective proposal by March 14, 2016. See ECF No. 572. The parties promptly began the meet
7 and confer process, but have sought extensions of the deadlines to submit injunctions in order to
8 allow further time for the parties to attempt to fashion an appropriate injunction or to potentially
9 resolve the case through a settlement, which the Court has granted. See ECF Nos. 575, 577, 579,
10 581.

11 The parties participated in a mediation on June 28, 2016, in the District of Columbia with
12 mediator Thomas J. Perrelli. Ullman Decl. ¶ 2. The parties have tentatively scheduled a second
13 mediation session for October 7, 2016, and believe an extension of the Court's deadlines would
14 facilitate the parties' efforts to potentially resolve the case through a joint proposed injunction or
15 a settlement. *Id.* Accordingly, the parties jointly request an extension to the Court's injunction
16 submission deadlines as follows, and submit that there is good cause for the requested
17 enlargement of time.
18

19 Extend the current deadline to submit a stipulated medical care injunction from:

20 August 12, 2016 to October 11, 2016;

21 Extend the current deadline to submit competing proposed injunctions and
22 supporting briefs (if necessary) from September 2, 2016 to October 18, 2016.

23 There have been thirty-one previous time modifications in this case. Because the Court has not
24 set any other deadlines in this case, the requested enlargements of time will not otherwise affect
25 the case schedule.
26

1 Dated: September 1, 2016

Respectfully submitted,

2 BENJAMIN C. MIZER
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6
7 /s/ Grant C. Schrader

/s/ Susan K. Ullman

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Attestation Pursuant to Civil Local Rule 5-1

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

Date: September 1, 2016

/s/ Susan K. Ullman
Susan K. Ullman