

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

WIKIMEDIA FOUNDATION,

Plaintiff,

v.

NATIONAL SECURITY AGENCY / CENTRAL
SECURITY SERVICE, *et al.*,

Defendants.

Hon. T. S. Ellis, III

Civil Action No.
15-cv-00662-TSE

**MOTION TO COMPEL DISCOVERY RESPONSES
AND DEPOSITION TESTIMONY**

Pursuant to Federal Rule of Civil Procedure 37(a)(3), Plaintiff Wikimedia Foundation respectfully moves the Court for an order compelling Defendants to provide full and complete responses to Plaintiff's interrogatories and requests for admission, and to produce all documents responsive to Plaintiff's requests for production, consistent with the in camera review procedures in Section 1806(f) of the Foreign Intelligence Surveillance Act ("FISA"). Plaintiff also respectfully moves the Court for an order applying the in camera review procedures in Section 1806(f) to resolve disputes arising out of Plaintiff's deposition of Defendant National Security Agency. This motion is based on Plaintiff's Memorandum of Law and the accompanying declaration and exhibits, filed concurrently with this motion; on the record in this action; and on other oral or written argument that may be offered by the parties at or before any hearing on this motion.

A proposed order is attached hereto.

Dated: March 26, 2018

Respectfully submitted,

 /s/

Deborah A. Jeon (Bar No. 06905)
David R. Rocah (Bar No. 27315)
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF MARYLAND
3600 Clipper Mill Rd., #350
Baltimore, MD 21211
Phone: (410) 889-8555
Fax: (410) 366-7838
jeon@aclu-md.org

 /s/

Patrick Toomey (pro hac vice)
*(signed by Patrick Toomey with permission of
Deborah A. Jeon)*
Ashley Gorski (pro hac vice)
Jonathan Hafetz (pro hac vice)
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
125 Broad Street, 18th Floor
New York, NY 10004
Phone: (212) 549-2500
Fax: (212) 549-2654
ptoomey@aclu.org

Alex Abdo (pro hac vice)
Jameel Jaffer (pro hac vice)
KNIGHT FIRST AMENDMENT INSTITUTE
AT COLUMBIA UNIVERSITY
475 Riverside Drive, Suite 302
New York, NY 10115
Phone: (646) 745-8500
alex.abdo@knightcolumbia.org

Counsel for Plaintiff