

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

WIKIMEDIA FOUNDATION,

Plaintiff,

v.

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

Defendants.

Civil Action No.
15-cv-00662-TSE

**DECLARATION OF ASHLEY GORSKI IN SUPPORT OF
PLAINTIFF WIKIMEDIA FOUNDATION'S MOTION TO COMPEL**

I, Ashley Gorski, a member of the Bar of the State of New York and admitted *pro hac vice* to the Bar of this Court, declare under penalty of perjury as follows:

1. I am an attorney with the American Civil Liberties Union Foundation, and represent Plaintiff Wikimedia Foundation in this matter. I submit this declaration in support of Plaintiff's Motion to Compel.

2. Attached hereto as **Exhibit 1** is a chart identifying the questions from the April 16, 2018 deposition of Defendant National Security Agency on which Plaintiff is moving to compel testimony.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the redacted transcript of the April 16, 2018 deposition of Defendant National Security Agency's designated witness, Rebecca J. Richards, pursuant to Federal Rule of Civil Procedure 30(b)(6).

* * *

I declare under penalty of perjury that the foregoing is true and correct.


Ashley Gorski

Date: May 18, 2018
New York, New York