

Wikimedia Foundation v. NSA
No. 15-cv-0062-TSE (D. Md.)

Plaintiff's Exhibit 5

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

WIKIMEDIA FOUNDATION,

Plaintiff,

v.

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

Defendants.

No. 15-cv-00662-TSE

SECOND DECLARATION OF EMILY TEMPLE-WOOD

I, Emily Temple-Wood, declare:

1. I am a U.S. citizen and resident of Downers Grove, Illinois, over the age of eighteen. I have personal knowledge of the facts stated in this declaration, and, if called to testify, I could and would testify competently thereto. I am providing this declaration in my capacity as a Wikimedia Foundation, Inc. (“Wikimedia”) community member. I am not an employee or contractor of Wikimedia.

I. Background

2. My earlier declaration in this litigation attested to the relationship between Wikimedia and its users; the importance of Wikimedia’s non-U.S. readers and contributors to U.S. users like myself; the importance of anonymity to Wikimedia users; and obstacles that other users and I face in bringing suit.

3. As detailed in that declaration, since April 2007, I have been both a reader and an editor of the English Wikipedia. I have created nearly 400 articles on Wikipedia and have edited thousands more.

II. Contributing to Wikimedia While Outside of the United States

4. Throughout my time as a member of the Wikimedia community, I have traveled to numerous countries outside of the United States, including for the purpose of attending Wikimedia conferences abroad.

5. As a U.S. citizen traveling abroad, I have continued to serve as an editor of the English Wikipedia. While outside of the United States, I have edited hundreds of Wikipedia articles, including:

- Cherney incision, https://en.wikipedia.org/wiki/Cherney_incision (edited from Mexico);
- Urethral diverticulum, https://en.wikipedia.org/wiki/Urethral_diverticulum (edited from Mexico);
- X-linked recessive hypoparathyroidism, https://en.wikipedia.org/wiki/X-linked_recessive_hypoparathyroidism (edited from Mexico);
- Lucie Randoin, https://en.wikipedia.org/wiki/Lucie_Randoin (edited from Mexico);
- Birt-Hogg-Dubé syndrome, https://en.wikipedia.org/wiki/Birt%E2%80%93Hogg%E2%80%93Dub%C3%A9_syndrome (edited from Hong Kong);
- Wikipedia talk:WikiProject Women scientists: Difference between revisions, https://en.wikipedia.org/w/index.php?title=Wikipedia_talk:WikiProject_Women_scientists&diff=prev&oldid=567822352 (edited from Hong Kong); and
- Endometrial cancer, https://en.wikipedia.org/wiki/Endometrial_cancer (edited from the United Kingdom).

6. While traveling abroad, I have edited Wikipedia articles from my pseudonymous account.

7. While traveling abroad, I have removed sensitive items within Wikipedia pages from public view in my capacity as an English Wikipedia administrator.

8. I have also witnessed dozens of individuals whom I believe to be U.S. citizens or permanent residents edit Wikipedia articles while they, too, are outside of the United States.

9. I intend to continue traveling abroad on at least an annual basis. During these travels, I also intend to continue editing Wikipedia articles.

10. As a Wikipedia user, I am concerned about government surveillance, including Upstream surveillance of my communications while abroad with Wikimedia servers in the United States. *See also* First Declaration of Emily Temple-Wood ¶ 20.

III. Upstream Surveillance Impairs My and Other U.S. Users' Ability to Exchange Information with Wikimedia's Foreign Readers and Editors

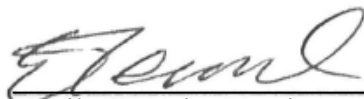
11. As detailed in my earlier declaration, my interest in contributing to Wikipedia is based in part on my ability to reach an international audience, and I also read and benefit from the contributions of non-U.S. users on a wide array of topics.

12. NSA surveillance, including Upstream surveillance, threatens the anonymity and privacy of Wikimedia community members, and that threat discourages individuals from engaging with the Wikimedia Projects.

13. The loss of foreign readers and editors is a direct detriment to me and to the Wikimedia community at large. When foreign users are less willing to read Wikimedia Project pages, I and other community members lose potential readers of our original content and other contributions to the Projects. When foreign users are less willing to contribute to Wikimedia Project pages, I and other community members are unable to read and benefit from their contributions.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 8, 2019, in Downers Grove, Illinois.



Emily Temple-Wood