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13 *Attorneys for Defendants*

14
15 **UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

16 WILEY GILL; JAMES PRIGOFF; TARIQ
17 RAZAK; KHALID IBRAHIM; and AARON
CONKLIN,

18 Plaintiffs,

19 v.

20 DEPARTMENT OF JUSTICE, *et al.*,

21 Defendants.
22
23

No. 3:14-cv-03120 (RS)

**PARTIES' JOINT STIPULATION
REGARDING FILING OF UNREDACTED
ANSWER**

RECITALS

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2 1. Pursuant to Court Order (Doc. No. 44), Defendants filed a redacted answer on
3 April 3, 2015.

4 2. The redacted answer was filed under seal pending Plaintiffs’ review of the answer
5 to determine if they consent to Privacy Act protected information contained therein being
6 publicly released.

7 3. Each of the Plaintiffs have signed Privacy Act waivers authorizing Plaintiffs’
8 counsel to stipulate to the public release of Privacy Act protected information contained in the
9 answer on their behalf.

10 4. On April 20, 2015, Plaintiffs’ counsel informed undersigned counsel that all five
11 Plaintiffs consent to the public release of Privacy Act protected information in the answer and
12 consent to the public filing of an unredacted answer that contains that information.

13 5. An unredacted answer can therefore be filed with the Court on the public docket.

STIPULATION

14
15 The parties hereby stipulate that an unredacted answer can be filed on the public docket
16 now that Plaintiffs have reviewed the answer and consent to the public release of the Privacy Act
17 protected information contained therein.

18
19 April 24, 2015

Respectfully submitted,

20 BENJAMIN C. MIZER
21 Principal Deputy Assistant Attorney General

22 ANTHONY J. COPPOLINO
23 Deputy Branch Director

24 PAUL G. FREEBORNE
25 Senior Trial Counsel

26 /s/ Kieran G. Gostin
27 KIERAN G. GOSTIN
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DECLARATION PURSUANT TO LOCAL RULE 5-1

I, Kieran G. Gostin, hereby declare pursuant to Local Rule 5-1 that I have obtained the concurrence in the filing of this document from each of the other signatories listed below.

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

Executed on April 24, 2015, in the City of Washington, District of Columbia.

/s/ Kieran G. Gostin

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