

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AMERICAN CIVIL LIBERTIES UNION and  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION,

*Plaintiffs,*

v.

OFFICE OF THE DIRECTOR OF  
NATIONAL INTELLIGENCE, NATIONAL  
SECURITY AGENCY, CENTRAL  
INTELLIGENCE AGENCY, and  
DEPARTMENT OF JUSTICE,

*Defendants.*

Case No. 18-cv-12131 (LGS)

Hon. Lorna G. Schofield  
United States District Judge

**DECLARATION OF NOOR  
ZAFAR IN SUPPORT OF MOTION  
FOR WITHDRAWAL AS COUNSEL**

I, Noor Zafar, declare under penalty of perjury that the following is true and correct:

1. I submit this declaration in support of my motion seeking permission from the Court to withdraw my appearance in the above-captioned matter.
2. I am an attorney with the American Civil Liberties Union Foundation (“ACLU”) and represent Plaintiffs in the above-captioned case.
3. Due to my departure from this division of the ACLU, I am no longer able to represent Plaintiffs.
4. Plaintiffs continue to be represented by ACLU attorney, Patrick Toomey.
5. I am not asserting a retaining or charging lien of any kind.
6. No party will be prejudiced by my withdrawal.

Dated: September 23, 2020

Respectfully submitted,

*/s/ Noor Zafar*

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Noor Zafar

American Civil Liberties Union Foundation

125 Broad Street, 18<sup>th</sup> Floor

New York, NY 1004

Tel: (212) 549-2500

Fax: (212) 549-2654

[nzafar@aclu.org](mailto:nzafar@aclu.org)

*Counsel for Plaintiffs*