

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

WIKIMEDIA FOUNDATION, *et al.*,

Plaintiffs,

v.

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

Defendants.

Hon. T. S. Ellis, III

Civil Action No.
15-cv-00662-TSE

JOINT MOTION TO CONDUCT HEARINGS
IN ALEXANDRIA, VIRGINIA

As directed in the Court's scheduling order docketed May 14, 2015 (ECF No. 61), the parties write jointly to inform the Court that they consent to moving future hearings in the above-captioned matter to the Albert V. Bryan United States Courthouse in Alexandria, Virginia. The Court also asked the parties to consider, but emphasized that it would not require, that the case be transferred to the Eastern District of Virginia pursuant to 28 U.S.C. § 1404(a). After discussing the matter, one or more of the parties opted to maintain the action in the District of Maryland.

Dated: May 29, 2015

/s/ James J. Gilligan

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Respectfully submitted,

/s/ Patrick Toomey

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(signed by Patrick Toomey with
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