

**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 AMEND THE BRIEFING SCHEDULE

Plaintiffs write to respectfully notify the Court that they intend to file a motion seeking leave to amend the complaint as a matter of course within the time permitted by Federal Rule of Civil Procedure 15(a)(1)(B), on or before June 19, 2015. Plaintiffs have informed the government of their plans and the parties have conferred about the impact on the scheduling order entered by the Court on May 14, 2015 (ECF No. 61).

Accordingly, in light of Plaintiffs' anticipated motion, the parties jointly request that the Court amend the schedule as follows:

1. Plaintiffs' motion for leave to amend the complaint must be filed by Friday, June 19, 2015.
2. Defendants' renewed Rule 12(b)(1) motion to dismiss must be filed by Thursday, July 16, 2015. (50 pages)
3. Plaintiffs' opposition to defendants' Rule 12(b)(1) motion to dismiss must be filed by Thursday, August 13, 2015. (50 pages)
4. Defendants' reply to plaintiffs' opposition must be filed by Thursday, August 27, 2015. (25 pages)

The proposed schedule reflects the parties' effort to reach agreement in light of the fact that Plaintiffs' lead counsel will be unavailable for several weeks in July while on paternity leave and the fact that counsel for the government have previously scheduled, pre-paid travel plans (in some cases overseas) in June and July.

Dated: June 12, 2015

Respectfully submitted,

/s/ James J. Gilligan

/s/ Patrick Toomey

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