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16 Attorneys for Plaintiffs

17 **UNITED STATES DISTRICT COURT**
18 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN FRANCISCO DIVISION**

20 CAROLYN JEWEL, TASH HEPTING,)
21 YOUNG BOON HICKS, as executrix of the)
22 estate of GREGORY HICKS, ERIK KNUTZEN)
23 and JOICE WALTON, on behalf of themselves)
24 and all others similarly situated,)
Plaintiffs,)
25 v.)
26 NATIONAL SECURITY AGENCY, *et al.*,)
27 Defendants.)

Case No.: 08-cv-4373-JSW

DECLARATION OF CINDY COHN

Courtroom 11, 19th Floor
The Honorable Jeffrey S. White

1 I, CINDY COHN, hereby declare:

2 1. I am a lawyer duly licensed to practice law in the State of California and before this
3 district. I am the Legal Director of the Electronic Frontier Foundation, counsel of record for the
4 plaintiffs.

5 2. I have attached to this Declaration true and correct copies of the following
6 documents:

- 7
- 8 • **Exhibit A:** Complaint for Constitutional and Statutory Violations, Seeking
9 Damages, Declaratory and Injunctive Relief in *Carolyn Jewel, et al., v. National*
10 *Security Agency, et al.*, No. 08-cv-4373-JSW (N.D. Cal.) filed September 18, 2008;
 - 11 • **Exhibit B:** First Amended Complaint for Constitutional and Statutory
12 Violations, Seeking Declaratory and Injunctive Relief in *First Unitarian Church of*
13 *Los Angeles, et al. v. National Security Agency, et al.*, Case No. 13-cv-3287-JSW
14 (N.D. Cal.) filed on March 7, 2014;
 - 15 • **Exhibit C:** Evidence Preservation Order in *Carolyn Jewel, et al., v. National*
16 *Security Agency, et al.*, No. 08-cv-4373-JSW (N.D. Cal.) filed November 16, 2009;
 - 17 • **Exhibit D:** Evidence Preservation Order in *In Re: National Security Agency*
18 *Telecommunications Records Litigation*, MDL No. 06-cv-1791-VRW (N.D. Cal.)
19 dated November 6, 2007; and
 - 20 • **Exhibit E:** Emails between plaintiffs and defendants regarding preservation
21 issues.

22 I declare under penalty of perjury under the laws of the United States that the foregoing is
23 true and correct. Executed on March 10, 2014, at San Francisco, California.

24 /s/ Cindy Cohn
25 CINDY COHN