

CINDY COHN (SBN 145997)  
cindy@eff.org  
DAVID GREENE (SBN 160107)  
davidg@eff.org  
AARON MACKEY (SBN 286647)  
amackey@eff.org  
ANDREW CROCKER (SBN 291596)  
andrew@eff.org  
LEE TIEN (SBN 148216)  
tien@eff.org  
ELECTRONIC FRONTIER FOUNDATION  
815 Eddy Street  
San Francisco, CA 94109  
Tel: (415) 436-9333  
  
RICHARD R. WIEBE (SBN 121156)  
wiebe@pacbell.net  
LAW OFFICE OF RICHARD R. WIEBE  
425 California St, Ste 2300  
San Francisco, CA 94104  
Tel: (415) 433-3200  
  
RACHAEL E. MENY (SBN 178514)  
rmeny@kvn.com  
BENJAMIN W. BERKOWITZ (SBN 244441)  
KEKER, VAN NEST & PETERS, LLP  
633 Battery Street  
San Francisco, California 94111  
Tel: (415) 391-5400  
  
THOMAS E. MOORE III (SBN 115107)  
tom.moore@haynesboone.com  
Haynes Boone, LLP  
525 University Avenue Suite 400  
Palo Alto, CA 94301  
Tel: (650) 687-8800

ARAM ANTARAMIAN (SBN 239070)  
antaramian@sonic.net  
LAW OFFICE OF ARAM ANTARAMIAN  
1714 Blake Street  
Berkeley, CA 94703  
Tel: (510) 289-1626  
  
Counsel for Plaintiffs

BRIAN M. BOYNTON  
Principal Deputy Assistant Attorney General  
ANTHONY J. COPPOLINO  
Deputy Branch Director  
JAMES J. GILLIGAN  
JULIA A. HEIMAN  
OLIVIA HUSSEY SCOTT  
Attorneys  
U.S. Department of Justice,  
Civil Division, Federal Programs Branch  
P.O. Box 883, Ben Franklin Station  
Washington, D.C. 20044  
Tel: (202) 514-3358  
Email: [james.gilligan@usdoj.gov](mailto:james.gilligan@usdoj.gov)

Counsel for the Government Defendants

JEREMY SCOTT BRUMBELOW (Arkansas  
Bar No. 96145)  
Tel: (202) 616-4330  
Email: [jeremy.brumbelow@usdoj.gov](mailto:jeremy.brumbelow@usdoj.gov)  
Senior Trial Attorneys  
United States Department of Justice  
Civil Division, Torts Branch  
P.O. Box 7146, Ben Franklin Station  
Washington, D.C. 20044

Counsel for the Individual-Capacity Defendants

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

FIRST UNITARIAN CHURCH OF LOS  
ANGELES, *et al.*,  
  
Plaintiffs,  
  
v.  
  
NATIONAL SECURITY AGENCY, *et al.*,  
  
Defendants.

Case No. 4:13-CV-3287-JSW

**JOINT CASE STATUS CONFERENCE  
STATEMENT**

Pursuant to the Court's order of July 25, 2022, ECF No. 155, the parties respectfully submit this Joint Case Status Conference Statement, indicating the parties' positions on how they wish to proceed in this matter.

As of this filing, counsel for Plaintiffs and the Government Defendants have contacted all of their clients and obtained consent to reach a resolution of this matter based on general terms discussed earlier between counsel. The Government Defendants have also now completed their due diligence needed to formulate specific terms on which they believe this matter can be resolved, and have presented a proposal to Plaintiffs for their consideration. The parties continue to discuss the exact terms of a resolution.

In light of the progress they continue to make, the parties wish to continue their discussions and efforts toward a potential resolution of this matter and other similar matters, and therefore jointly propose to submit another Joint Case Status Conference Statement on April 7, 2023.

Dated: March 6, 2023

Respectfully submitted,

By:

**COUNSEL FOR PLAINTIFFS:**

/s/ David Greene

DAVID GREENE (SBN 160107)

CINDY COHN (SBN 145997)

AARON MACKEY (SBN 286647)

ANDREW CROCKER (SBN 291596)

LEE TIEN (SBN 148216)

ELECTRONIC FRONTIER FOUNDATION

815 Eddy Street

San Francisco, CA 94109

Tel.: (415) 436-9333

Email: davidg@eff.org, cindy@eff.org,

amackey@eff.org, andrew@eff.org,

kurt@eff.org, [tien@eff.org](mailto:tien@eff.org)

RACHAEL E. MENY (SBN 178514)

BENJAMIN BERKOWITZ (SBN 244441)

KEKER, VAN NEST & PETERS, LLP

RICHARD R. WIEBE (SBN 121156)

LAW OFFICE OF RICHARD R. WIEBE

THOMAS E. MOORE III (SBN 115107)  
HAYNES BOONE, LLP

ARAM ANTARAMIAN (SBN 239070)  
LAW OFFICE OF ARAM ANTARAMIAN

**COUNSEL FOR THE  
GOVERNMENT DEFENDANTS:**

BRIAN M. BOYNTON  
Principal Deputy Assistant Attorney General

ANTHONY J. COPPOLINO  
Deputy Branch Director

/s/ James J. Gilligan\*  
JAMES J. GILLIGAN  
Special Litigation Counsel

JULIA A. HEIMAN  
OLIVIA HUSSEY SCOTT  
Attorneys

U.S. Department of Justice,  
Civil Division, Federal Programs Branch  
P.O. Box 883  
Washington, D.C. 20044  
Phone: (202) 514-3358  
Email: [james.gilligan@usdoj.gov](mailto:james.gilligan@usdoj.gov)

**COUNSEL FOR THE INDIVIDUAL-  
CAPACITY DEFENDANTS**

/s/ Jeremy Scott Brumbelow  
JEREMY SCOTT BRUMBELOW (Arkansas  
Bar No. 96145)  
Tel: (202)616-4330  
Email: [jeremy.brumbelow@usdoj.gov](mailto:jeremy.brumbelow@usdoj.gov)

Senior Trial Attorney  
United States Department of Justice  
Civil Division, Torts Branch  
P.O. Box 7146, Ben Franklin Station  
Washington, D.C. 20044

*\*In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty of perjury that each signatory has concurred in the filing of this document.*