

1 STUART F. DELERY  
 Assistant Attorney General  
 2 JOSEPH H. HUNT  
 Director, Federal Programs Branch  
 3 ANTHONY J. COPPOLINO  
 Deputy Branch Director  
 4 JAMES J. GILLIGAN  
 Special Litigation Counsel  
 5 [james.gilligan@usdoj.gov](mailto:james.gilligan@usdoj.gov)  
 MARCIA BERMAN  
 6 Senior Trial Counsel  
[marcia.berman@usdoj.gov](mailto:marcia.berman@usdoj.gov)  
 7 BRYAN DEARINGER  
 Trial Attorney  
 8 RODNEY PATTON  
 Trial Attorney  
 9 JULIA BERMAN  
 Trial Attorney  
 10 U.S. Department of Justice, Civil Division  
 20 Massachusetts Avenue, NW, Rm. 7132  
 11 Washington, D.C. 20001  
 Phone: (202) 514-2205; Fax: (202) 616-8470  
 12 *Attorneys for the Government Defs. in their Official Capacity*

13 **UNITED STATES DISTRICT COURT**  
 14 **NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

15 CAROLYN JEWEL, *et al.*, )  
 16 )  
 Plaintiffs, )  
 17 )  
 v. )  
 18 )  
 NATIONAL SECURITY AGENCY, *et al.*, )  
 19 )  
 Defendants. )

Case No. 4:08-cv-04373-JSW  
 Case No. 4:07-cv-00693-JSW

**GOVERNMENT DEFENDANTS’  
 ADMINISTRATIVE MOTION TO FILE  
 UNDER SEAL THEIR RESPONSE TO  
 THE COURT’S ORDER OF  
 JULY 11, 2014**

21 VIRGINIA SHUBERT, *et al.*, )  
 22 )  
 Plaintiffs, )  
 23 )  
 v. )  
 24 )  
 BARACK OBAMA, *et al.*, )  
 25 )  
 Defendants. )

No hearing scheduled  
 Oakland Courthouse  
 Courtroom 5, 2nd Floor  
 The Honorable Jeffrey S. White

27 Pursuant to Local Rule 79-5 and the Court’s July 11, 2014 Order (“Order”), the  
 28 undersigned counsel for the Government Defendants hereby move to file under seal their  
 Government Defendants’ Administrative Motion to File Under Seal their Response to the Court’s Order of July 11,  
 2014, *Jewel v. National Security Agency* (4:08-cv-4373-JSW), *Shubert v. Obama* (4:07-cv-693-JSW)

1 response to the Court's Order.

2 As required by Local Rule 79-5, submitted herewith are: a declaration establishing that  
3 the document requested to be filed under seal is properly sealable, and a proposed order that  
4 identifies the sealable material. As explained in the Declaration of Marcia Berman submitted  
5 herewith, the Government Defendants' response to the Court's Order is properly sealable  
6 because the Court's Order required that the document in question be submitted under seal. *See*  
7 Decl. of Marcia Berman, Exhibit 1 hereto, ¶ 3; *see also* Order at 2.

8 For the foregoing reasons, the Government Defendants respectfully request that the Court  
9 grant this administrative motion.

10 Dated: July 28, 2014

Respectfully Submitted,

11 STUART F. DELERY  
12 Assistant Attorney General

13 JOSEPH H. HUNT  
14 Director, Federal Programs Branch

15 ANTHONY J. COPPOLINO  
16 Deputy Branch Director

17 /s/Marcia Berman

18 JAMES J. GILLIGAN  
19 Special Litigation Counsel  
20 [james.gilligan@usdoj.gov](mailto:james.gilligan@usdoj.gov)

21 MARCIA BERMAN  
22 Senior Trial Counsel  
23 [marcia.berman@usdoj.gov](mailto:marcia.berman@usdoj.gov)

24 BRYAN DEARINGER  
25 Trial Attorney  
26 [bryan.dearinger@usdoj.gov](mailto:bryan.dearinger@usdoj.gov)

27 RODNEY PATTON  
28 Trial Attorney  
[rodney.patton@usdoj.gov](mailto:rodney.patton@usdoj.gov)

JULIA BERMAN  
[julia.berman@usdoj.gov](mailto:julia.berman@usdoj.gov)  
U.S. Department of Justice  
Civil Division, Federal Programs Branch  
20 Massachusetts Avenue, NW, Rm. 7132  
Washington, D.C. 20001  
Phone: (202) 514-2205  
Fax: (202) 616-8470

*Attorneys for the Government Defendants  
Sued in their Official Capacities*