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Attorneys for Plaintiffs

18 UNITED STATES DISTRICT COURT
 19 FOR THE NORTHERN DISTRICT OF CALIFORNIA

20	CAROLYN JEWEL, TASH HEPTING,)	CASE NO. 08-CV-4373-JSW
21	YOUNG BOON HICKS, as executrix of the)	
22	estate of GREGORY HICKS, ERIK KNUTZEN)	PLAINTIFF ERIK KNUTZEN'S FIRST
23	and JOICE WALTON, on behalf of themselves)	SET OF INTERROGATORIES TO THE
24	and all others similarly situated,)	GOVERNMENT DEFENDANTS
25)	
26	Plaintiffs,)	Served June 17, 2016
27)	
28	v.)	The Honorable Jeffrey S. White
)	
	NATIONAL SECURITY AGENCY, <i>et al.</i> ,)	
)	
	Defendants.)	

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INTERROGATORIES

I. Interrogatories Addressing Copying And Searching Of Internet Communications During The PSP Period

INTERROGATORY NO. 1: Describe the process by which during the PSP Period You or any other person or entity procured by You acquired within the United States the contents of electronic communications sent or received within the United States by AT&T customers while in transmission over the Internet without any warrant or court order authorizing You to do so.

INTERROGATORY NO. 2: Describe the process by which during the PSP Period You or any other person or entity procured by You copied within the United States the contents of electronic communications sent or received within the United States by AT&T customers while in transmission over the Internet without any warrant or court order authorizing You to do so.

INTERROGATORY NO. 3: Describe the process by which during the PSP Period You or any other person or entity procured by You filtered the contents of electronic communications sent or received within the United States by AT&T customers and copied within the United States while in transmission over the Internet without any warrant or court order authorizing You to do so.

INTERROGATORY NO. 4: Describe the process by which during the PSP Period You or any other person or entity procured by You searched the contents of electronic communications sent or received within the United States by AT&T customers and copied within the United States while in transmission over the Internet without any warrant or court order authorizing You to do so.

INTERROGATORY NO. 5: Describe any use of the Folsom Street Facility to copy, filter, and/or search the contents of electronic communications sent or received within the United States by AT&T customers during the PSP Period.

1 **INTERROGATORY NO. 6:** Identify the number of each plaintiff's electronic communications
2 You copied or procured to be copied or caused to be copied within the United States by the use of a
3 device during the PSP Period while in transmission over the Internet without any warrant or court
4 order authorizing You to do so.
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6 **II. Interrogatories Addressing Copying And Searching Of Plaintiffs' Internet**
7 **Communications**
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9 **INTERROGATORY NO. 7:** Identify the number of each plaintiff's electronic communications
10 You caused to be searched without any warrant or court order authorizing You to do so.
11

12 **INTERROGATORY NO. 8:** Identify the number of each plaintiff's electronic communications
13 You caused to be searched without any probable cause to believe or individualized suspicion that
14 the searched communication contained the searched-for information.
15

16 **III. Interrogatories Addressing Copying And Searching Of Internet Communications Under**
17 **"Upstream" Collection**
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19 **INTERROGATORY NO. 9:** Describe the process by which in Your upstream collection You or
20 any other person or entity acquire within the United States the contents of electronic
21 communications sent or received within the United States by AT&T customers while in
22 transmission over the Internet.
23

24 **INTERROGATORY NO. 10:** Describe the process by which in Your upstream collection You or
25 any other person or entity copy within the United States the contents of electronic communications
26 sent or received within the United States by AT&T customers while in transmission over the
27 Internet.
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1 **INTERROGATORY NO. 11:** Describe the process by which in Your upstream collection You or
2 any other person or entity filter the contents of electronic communications sent or received within
3 the United States by AT&T customers and copied within the United States while in transmission
4 over the Internet.

5
6 **INTERROGATORY NO. 12:** Describe the process by which in Your upstream collection You or
7 any other person or entity search the contents of electronic communications sent or received within
8 the United States by AT&T customers and copied within the United States while in transmission
9 over the Internet.

10
11 **INTERROGATORY NO. 13:** Describe any use of the Folsom Street Facility to copy, filter,
12 and/or search the contents of electronic communications sent or received within the United States
13 by AT&T customers as part of Your upstream collection.

14
15 **INTERROGATORY NO. 14:** Identify the number of each plaintiff's electronic communications
16 You copied or procured to be copied or caused to be copied within the United States by the use of a
17 device while in transmission over the Internet as part of Your upstream collection.

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19 **INTERROGATORY NO. 15:** Identify the number of each plaintiff's electronic communications
20 You searched or procured to be searched or caused to be searched as part of Your upstream
21 collection.

22
23 **IV. Interrogatories Addressing Any Potential Grounds Assertedly Justifying Copying And**
24 **Searching Of Internet Communications**

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26 **INTERROGATORY NO. 16:** Describe any probable cause or individualized suspicion relating
27 to plaintiffs that at any time has supported the copying of plaintiffs' electronic communications.
28

1 **INTERROGATORY NO. 17:** Describe any probable cause or individualized suspicion relating
2 to plaintiffs that at any time has supported the searching of plaintiffs' electronic communications.
3

4 **INTERROGATORY NO. 18:** Describe all facts on which You base Your contention that the
5 "special needs" exception justifies the copying and searching of plaintiffs' communications.
6

7 **INTERROGATORY NO. 19:** Describe all facts on which You base Your contention that the
8 copying and searching of plaintiffs' communications is only a minimal intrusion on plaintiffs'
9 privacy interests.
10

11 **INTERROGATORY NO. 20:** Describe all facts on which You base Your contention that
12 applying the warrant and probable-cause requirements to the copying and searching of plaintiffs'
13 communications is impracticable.
14

15 **INTERROGATORY NO. 21:** Describe all facts on which You base Your contention that the
16 primary purpose of the copying and searching of plaintiffs' communications is not law
17 enforcement.
18

19 **V. Interrogatories Addressing Acquisition Of Communications Records**
20


21 **INTERROGATORY NO. 22:** Describe the process by which during the PSP Period You
22 obtained any records or other information pertaining to subscribers or customers of AT&T's
23 electronic communications services or remote computing services without any warrant or court
24 order or subpoena authorizing the disclosure.
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26 **INTERROGATORY NO. 23:** Describe each disclosure to You during the PSP Period, pursuant
27 to a process of bulk collection, of any records or other information pertaining to subscribers or
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1 customers of AT&T's electronic communications services or remote computing services without
2 any warrant or court order or subpoena authorizing the disclosure.

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4 **INTERROGATORY NO. 24:** Describe each disclosure to You, pursuant to a process of bulk
5 collection, of any records or other information pertaining to subscribers or customers of AT&T's
6 electronic communications services or remote computing services.
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10 DATE: June 17, 2016

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12 Richard R. Wiebe

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