

Shayana Kadidal
Michael Ratner
CENTER FOR CONSTITUTIONAL RIGHTS
666 Broadway, 7th Floor
New York, NY 10012-2317
Phone: (212) 614-6438
Fax: (212) 614-6499
Email: kadidal@ccr-ny.org

David Cole
c/o Georgetown University Law Center
600 New Jersey Avenue, N.W.
Washington, D.C. 20001
Phone: (202) 662-9078

Michael Avery
J. Ashlee Albies
NATIONAL LAWYERS GUILD
c/o Suffolk Law School
120 Tremont Street
Boston, MA 02108
Phone: (617) 573-8551
Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE NATIONAL SECURITY AGENCY
TELECOMMUNICATIONS RECORDS
LITIGATION

No. M:06-cv-01791-VRW

**PLAINTIFFS' MOTION TO
SUPPLEMENT COMPLAINT**

This Document Relates Only to:
Center for Constitutional Rights v. Bush, Case No. 07-1115

Plaintiffs Center for Constitutional Rights, Tina M. Foster, Gitanjali S. Gutierrez, Seema Ahmad, Maria LaHood, and Rachel Meeropol hereby move, pursuant to Fed. R. Civ. P. 15(d), for an order allowing Plaintiffs to file a supplemental complaint based on recent legislative developments which substantially alter the Foreign Intelligence Surveillance Act (FISA), 50

U.S.C. § 1801, et. seq., a statute central to this litigation. On August 6, 2007, President Bush signed into law an amendment to FISA which changes the standards by which surveillance of international communications may be conducted where one person is believed to be located outside the U.S.. These amendments continue to adversely affect Plaintiffs, and it is their contention that any surveillance conducted pursuant to the amended FISA continues to violate Plaintiffs' First and Fourth Amendment rights.

Plaintiffs have attempted to confer with Defendants on this motion, both prior to and after the hearing of August 9, 2007, but they have not yet taken a position as to consent.

Respectfully submitted,

/s/Shayana Kadidal

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Michael Ratner
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(212) 614-6438

CCR Cooperating Counsel:

David Cole
c/o Georgetown University Law Center
600 New Jersey Avenue, N.W.
Washington, D.C. 20001
(202) 662-9078

Michael Avery
J. Ashlee Albies
NATIONAL LAWYERS GUILD
c/o Suffolk Law School
120 Tremont Street
Boston, MA 92108
(617) 573-8551

counsel for Plaintiffs

Dated: August 10, 2007

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE NATIONAL SECURITY AGENCY
TELECOMMUNICATIONS RECORDS
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No. M:06-cv-01791-VRW

[PROPOSED] ORDER

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Upon consideration of Plaintiffs' motion to supplement the complaint, it is:

HEREBY ORDERED that Plaintiffs' motion is GRANTED;

FURTHER ORDERED THAT Defendants may file a supplemental answer to Plaintiffs' supplemental complaint within 30 days from the date the supplemental complaint is filed.

SO ORDERED:

Date: _____

HON. VAUGHN R. WALKER
United States District Judge