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14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17 In re:
18 NATIONAL SECURITY AGENCY
19 TELECOMMUNICATIONS RECORDS
20 LITIGATION
21 This Document Relates To:
22 06-5452-VRW
23 06-6222-VRW
24 06-6224-VRW
25 06-6253-VRW
26 06-6254-VRW
06-6570-VRW
07-0464-VRW

MDL Dkt. No. 06-1791-VRW

**DECLARATION OF BRUCE A.
ERICSON IN SUPPORT OF
STIPULATION TO STAY CASES
AGAINST CINGULAR**

[Civil L.R. 6-2, 7-1(5), 7-12]

Courtroom: 6, 17th Floor
Judge: Hon. Vaughn R. Walker

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DECLARATION PURSUANT TO CIVIL L.R. 6-2(a)

I, **BRUCE A. ERICSON**, declare:

1. I am a member of the bar of this Court and a partner with the law firm of Pillsbury Winthrop Shaw Pittman LLP, attorneys of record for Cingular Wireless LLC (now known as AT&T Mobility LLC), New Cingular Wireless Services, Inc. and Cingular Wireless Corporation (now known as AT&T Mobility Corporation) (collectively, “Cingular”), defendants in various cases consolidated before this Court as part of *In Re National Security Agency Telecommunications Records Litigation*, MDL No. C-06-1791-VRW. I make this declaration in support of the accompanying Stipulation to Stay Cases Against Wireless Carriers (“Stipulation”). I have personal knowledge of the facts stated herein and, if called as a witness, I could and would competently testify thereto.

2. By entering the Stipulation, the parties thereto seek to stay all proceedings, including those proceedings transferred to this Court by the JPML and consolidated with this MDL subsequent to entry of the Stipulation, against Cingular until after the final adjudication of all appeals of this Court’s July 20, 2006 ruling in *Hepting, et al. v. AT&T Corp., et al.*, including disposition of any petition for certiorari to the United States Supreme Court (or the expiration of time to seek such a petition), without prejudice to the rights of the parties.

3. There have been four (4) previous time modifications in this MDL proceeding. *See* Dkts. 19, 52, 82, 112.

4. The Stipulation will only affect the schedule for this MDL as it applies to Cingular. Under the Stipulation, Cingular need not file pleadings responsive to the various consolidated complaints filed against them until sixty (60) days after the expiration of this stay.

I declare under penalty of perjury that the foregoing is true and correct.

1 Executed this 1st day of February 2007, at San Francisco, California.

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/s/ Bruce A. Ericson
Bruce A. Ericson

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