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9 Communications Services, Inc., Cellco Partnership,  
10 Verizon Wireless (VAW) LLC, and Verizon  
Wireless Services LLC

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 SAN FRANCISCO DIVISION

14 ) MDL NO. 06-1791 VRW

15 )  
16 IN RE: )

**VERIZON’S JOINDER IN UNITED  
STATES’ MOTION FOR A STAY  
PENDING DISPOSITION OF  
INTERLOCUTORY APPEAL IN  
HEPTING v. AT&T**

17 NATIONAL SECURITY AGENCY )  
18 TELECOMMUNICATIONS )  
RECORDS LITIGATION )

19 This Document Relates To: )

Judge: Hon. Vaughn R. Walker

20 ALL CASES )  
21 )  
22 )

23 The Verizon defendants<sup>1/</sup> hereby join the Motion of United States for a Stay Pending  
24 Disposition of Interlocutory Appeal in *Hepting v. AT&T Corp.*, No. 06-00672 (MDL Dkt. No. 67)  
25 (“Stay Motion”) filed on November 8, 2006. In particular, Verizon agrees that discovery (as well as

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27 <sup>1/</sup> The “Verizon defendants” are: Verizon Communications Inc., Verizon Global Networks Inc.,  
28 Verizon Northwest Inc., Verizon Maryland Inc., MCI, LLC, and MCI Communications Services,  
Inc., Cellco Partnership, Verizon Wireless (VAW) LLC, and Verizon Wireless Services LLC. *See*  
11-17-06 Hr’g Tr. at 81-82.

1 the filing of answers or resolution of any preliminary injunction motions) should be stayed pending  
2 resolution of the *Hepting* appeal. As the Government and the Defendants have explained,<sup>2/</sup>  
3 proceeding with any discovery would be at odds with the very notion of obtaining guidance from the  
4 Court of Appeals at the threshold regarding the appropriate scope and application of the state secrets  
5 privilege.

6 At this point, however, Verizon is not in a position to evaluate fully whether it intends to file  
7 a dispositive motion as to the claims against it, because the Plaintiffs have not yet submitted their  
8 master complaint against the Verizon defendants. Accordingly, Verizon expects to inform the Court  
9 and the parties of its position as to dispositive motions after the Plaintiffs file their master  
10 complaints.

11 Dated: December 22, 2006

12 WILMER CUTLER PICKERING HALE AND  
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19 By: /s/ Brian M. Boynton

20 \_\_\_\_\_  
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22 Attorneys for Verizon Communications Inc.,  
23 Verizon Global Networks Inc., Verizon  
24 Northwest Inc., Verizon Maryland Inc., MCI,  
25 LLC, and MCI Communications Services, Inc.,  
26 Cellco Partnership, Verizon Wireless (VAW)  
27 LLC, and Verizon Wireless Services LLC

28 \_\_\_\_\_  
<sup>2/</sup> See Joint Case Management Statement at 43-46 (filed Nov. 7, 2006); Stay Motion at 17-22;  
11-17-06 Hr’g Tr. at 27-29, 37, 57-65, 68.