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UNITED STATES DISTRICT COURT

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FOR THE NORTHERN DISTRICT OF CALIFORNIA

15

SAN FRANCISCO DIVISION

16

IN RE NATIONAL SECURITY AGENCY)
 TELECOMMUNICATIONS RECORDS)
 17 LITIGATION, MDL No. 1791)

MDL Docket No 06-1791 VRW

18

This Document Relates To:

CLASS ACTION

19

ALL CASES except AL HARAMAIN v. BUSH)
 20 and CCR v. BUSH)

**PLAINTIFFS' NOTICE OF MOTION
FOR ORDER TO PRESERVE
EVIDENCE**

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Judge: The Hon. Vaughn R. Walker
 Date: October 25, 2007
 Time: 2:00 p.m.
 Courtroom: 6, 17th Floor

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1 TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

2 PLEASE TAKE NOTICE that on October 25, 2007, at 2:00 p.m. in Courtroom 6 of the
3 above captioned Court, located at 450 Golden Gate Ave., 17th Floor, San Francisco, California,
4 Plaintiffs will, and hereby do, move the Court for an order requiring all parties to preserve
5 documents that they know, or reasonably should know, are relevant to the above titled action.

6 Plaintiffs seek to prevent parties from altering or destroying such information during
7 the pendency of this action. This motion is based on this notice of motion and motion,
8 memorandum of points and authorities, the declarations, exhibits, evidence filed in support thereof,
9 the pleadings and papers filed in this action, and oral arguments of counsel.

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11 DATED: September 10, 2007

ELECTRONIC FRONTIER FOUNDATION

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13 By _____ /s/
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CERTIFICATE OF SERVICE

I hereby certify that on September 10, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List.

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