

1 WILMER CUTLER PICKERING HALE  
AND DORR LLP  
2 John A. Rogovin (pro hac vice)  
Randolph D. Moss (pro hac vice)  
3 Samir C. Jain # 181572  
Brian M. Boynton # 222193  
4 Benjamin C. Mizer (pro hac vice)  
1875 Pennsylvania Ave, NW  
5 Washington, DC 20006  
Tel.: 202-663-6000  
6 Fax: 202-663-6363  
Email: john.rogovin@wilmerhale.com

MUNGER, TOLLES & OLSON LLP  
Henry Weissmann # 132418  
Susan R. Szabo # 155315  
Aimee A. Feinberg # 223309  
355 South Grand Avenue  
35th Floor  
Los Angeles, CA 90071-1560  
Tel.: 213-683-9100  
Fax: 213-683-5150  
Email: Henry.Weissmann@mto.com

7  
8 Randal S. Milch (pro hac vice)  
Verizon Communications Inc.  
One Verizon Way  
9 VC43E043  
Basking Ridge, NJ 07920  
10 Tel.: 908-559-1752  
Fax: 908-696-2136

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12 Attorneys for Verizon Communications Inc.,  
Verizon Global Networks Inc., and MCI, LLC

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

17 )  
18 IN RE: )  
19 NATIONAL SECURITY AGENCY )  
TELECOMMUNICATIONS )  
20 RECORDS LITIGATION )  
21 This Document Relates To: )  
22 No. 06-220 (D.R.I.) )  
No. 1:06-cv-632 (E.D. Cal.) )  
23 No. cv-06-77 (D. Mont.) )  
No. 06-2491 (D. La.) )  
24 No. cv-06-694 (D. Ore.) )  
No. 1:06-cv-2680 (N.D. Ill.) )  
25 No. 06-224 (D.R.I.) )  
No. 3:06-cv-3574 (N.D. Cal.) )  
26 No. 3:06-cv-4221 (N.D. Cal.) )  
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MDL NO. 06-1791 VRW

**VERIZON'S NOTICE OF MOTION AND  
MOTION TO DISMISS FOR LACK OF  
PERSONAL JURISDICTION AND  
SUPPORTING MEMORANDUM**

[Fed. R. Civ. P. 12(b)(2)]

Hearing Date: June 21, 2007  
Time: 2:00 p.m.  
Courtroom: 6 (17th floor)  
Judge: Hon. Vaughn R. Walker

1 **NOTICE OF MOTION AND MOTION TO DISMISS**

2 TO PLAINTIFFS AND THEIR ATTORNEYS OF RECORD:

3 PLEASE TAKE NOTICE that on June 21, 2007, at 2:00 p.m., in the United States District  
4 Court for the Northern District of California, San Francisco Division, located at 450 Golden Gate  
5 Avenue, San Francisco, California, in Courtroom 6 (17th floor), the following Motion To Dismiss  
6 for Lack of Personal Jurisdiction filed by Defendants Verizon Communications Inc., Verizon Global  
7 Networks Inc., and MCI, LLC will be heard.

8 Pursuant to Federal Rule of Civil Procedure 12(b)(2), Defendants Verizon Communications  
9 Inc., Verizon Global Networks Inc., and MCI, LLC hereby move to dismiss the complaints filed  
10 against them in *Bissitt et al. v. Verizon Communications Inc. et al.*, No. 06-220 (D.R.I.); *Conner et*  
11 *al. v. AT&T, Verizon et al.*, No. 1:06-cv-632 (E.D. Cal.), *Fuller v. Verizon Communications Inc.*, No.  
12 *cv-06-77* (D. Mont.); *Herron et al. v. Verizon Global Networks Inc. et al.*, No. 06-2491 (D. La.);  
13 *Hines v. Verizon Communications Inc.*, No. cv-06-694 (D. Ore.); *Joll et al. v. AT&T Corp., Verizon*  
14 *Communications Inc. et al.*, No. 1:06-cv-2680 (N.D. Ill.); *Mahoney v. Verizon Communications Inc.*,  
15 No. 06-224 (D.R.I.); *Riordan et al. v. Verizon Communications Inc.*, No. 3:06-cv-3574 (N.D. Cal.);  
16 and *Spielvogel-Landis v. MCI, LLC*, No. 3:06-cv-4221 (N.D. Cal.), on the ground that the courts in  
17 which those cases were initially filed lacked personal jurisdiction over them. This motion is based  
18 on this notice of motion and motion, the accompanying memorandum of law, the declaration of  
19 Joseph P. Dunbar filed herewith, all pleadings and records on file in these cases, and any other  
20 arguments and evidence presented to this Court at or before the hearing on this motion.

21 Defendants Verizon Communications Inc., Verizon Global Networks Inc., and MCI, LLC  
22 also join in the Motion To Dismiss Plaintiffs' Master Consolidated Complaint filed concurrently by  
23 Verizon Communications Inc., Verizon Northwest Inc., and MCI Communications Services, Inc.  
24 For the reasons set forth in that motion, the claims against Verizon Communications Inc., Verizon  
25 Global Networks Inc., and MCI, LLC should be dismissed even if this motion to dismiss for lack of  
26 personal jurisdiction is denied.

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Dated: April 30, 2007

Respectfully submitted,

WILMER CUTLER PICKERING HALE AND  
DORR LLP

MUNGER, TOLLES & OLSON LLP

Randal S. Milch

By: /s/ John A. Rogovin

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John A. Rogovin

Attorneys for Verizon Communications Inc.,  
Verizon Global Networks Inc., and MCI, LLC