CINDY COHN (SBN 145997)
cindy@eff.org
DAVID GREENE (SBN 160107)
LEE TIEN (SBN 148216)
KURT OPSAHL (SBN 191303)
JAMES S. TYRE (SBN 083117)
MARK RUMOLD (SBN 279060)
ANDREW CROCKER (SBN 291596)
JAMIE L. WILLIAMS (SBN 279046)
ELECTRONIC FRONTIER FOUNDATION
815 Eddy Street
San Francisco, CA 94109
Telephone: (415) 436-9333
Fax: (415) 436-9993

RICHARD R. WIEBE (SBN 121156)
wiebe@pacbell.net
LAW OFFICE OF RICHARD R. WIEBE
44 Montgomery Street, Suite 650
San Francisco, CA 94104
Telephone: (415) 433-3200
Fax: (415) 433-6382

RACHAEL E. MENY (SBN 178514)
rmeny@keker.com
BENJAMIN W. BERKOWITZ (SBN 244441)
PHILIP J. TASSIN (SBN 287787)
KEKER, VAN NEST & PETERS, LLP
633 Battery Street
San Francisco, CA 94111
Telephone: (415) 391-5400
Fax: (415) 397-7188

THOMAS E. MOORE III (SBN 115107)
tmoore@rroyselaw.com
ROYSE LAW FIRM, PC
149 Commonwealth Drive, Suite 1001
Menlo Park, CA 94025
Telephone: (650) 813-9700
Fax: (650) 813-9777

ARAM ANTARAMIAN (SBN 239070)
antaramian@sonic.net
LAW OFFICE OF ARAM ANTARAMIAN
1714 Blake Street
Berkeley, CA 94703
Telephone: (510) 289-1626

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

CAROLYN JEWEL, TASH HEPTING, YOUNG BOON HICKS, as executrix of the estate of GREGORY HICKS, ERIK KNUTZEN and JOICE WALTON, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

NATIONAL SECURITY AGENCY, *et al.*,

Defendants.

CASE NO. 08-CV-4373-JSW

PLAINTIFFS' MOTION FOR ACCESS TO CLASSIFIED DISCOVERY MATERIALS PURSUANT TO 18 U.S.C. § 2712(b)(4)

Date: July 6, 2018
Time: 9:00 a.m.
Place: Courtroom 5, Second Floor
Before: The Honorable Jeffrey S. White

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Cases

Statutes

Rules

NOTICE OF MOTION AND MOTION FOR ACCESS TO CLASSIFIED DISCOVERY MATERIALS PURSUANT TO 18 U.S.C. § 2712(b)(4)

PLEASE TAKE NOTICE that on July 6, 2018 at 9:00 a.m. or as soon thereafter as the matter might be heard in the United States District Court located at 1301 Clay Street, Oakland, California, plaintiffs Carolyn Jewel, Tash Hepting, Young Boon Hicks, as executrix of the estate of Gregory Hicks, Erik Knutzen, and Joice Walton (collectively "plaintiffs") will move the Court, pursuant to 18 U.S.C. section 2712(b)(4) (which incorporates the procedures of 50 U.S.C. section 1806(f) and authorizes access to classified materials by plaintiffs "where such disclosure is necessary to make an accurate determination"), to grant their counsel access to the classified discovery materials that defendants National Security Agency, Department of Justice, and the United States (the "government defendants") have submitted to the Court for its *ex parte, in camera* review.

To ensure an accurate determination of plaintiffs' standing, plaintiffs seek for three of their counsel of record, after receiving appropriate security clearances, to have access to the classified discovery materials at the Court's secured facility and to review those discovery materials at that facility. Plaintiffs do not seek access to any portion of the classified discovery materials that identify: human sources of intelligence information; the identities of the persons (other than plaintiffs in connection with searches conducted as part of this litigation) who were the subject of selectors used to scan or search databases; the selectors (other than those of plaintiffs in connection with this litigation) used to scan or search databases; the identities of any surveillance targets; or specific intelligence regarding terrorist groups or other surveillance targets.

In order for the Court to accurately determine plaintiffs' standing, access by plaintiffs' counsel to the voluminous and complex classified evidence is necessary so that they may analyze and explain that evidence, counter the government's arguments based on that evidence, use it in support of their arguments, and supplement, explain, or rebut that evidence with public evidence. The Court lacks the time, resources, technical background, and deep familiarity with the public evidence that would be required to perform this massive task practicably. This motion is based on the accompanying memorandum, the filings and pleadings of record in this action, and the

argument presented at the hearing on this motion.

MEMORANDUM OF POINTS AND AUTHORITIES

I. Introduction

At the May 2017 case management conference, the Court ordered the government defendants to marshal all of the relevant evidence relating to plaintiffs' standing and present it to the Court, and independently to respond to plaintiffs' standing-related discovery requests.

In response, the government defendants have now provided: (a) unclassified written responses to plaintiffs' discovery requests that do not disclose any new information relevant to plaintiffs' standing, but instead consist largely of objections, with a few restatements of information that the government defendants have previously publicly disclosed; (b) a 193-page classified declaration by National Security Agency Director Admiral Michael S. Rogers submitted *in camera* and *ex parte* to the Court, providing responses to plaintiffs' requests for admission and interrogatories in narrative form rather than in individual answers to plaintiffs' individual requests; (c) a heavily redacted public version of the Rogers Declaration which does not disclose any new information relevant to standing; and (c) no public documents, and an unknown number of classified documents provided only to the Court *in camera* and *ex parte*, for which no public redacted versions have been provided to plaintiffs. Some discovery remains to be completed by the government defendants, but it, too, will be provided to the Court *in camera* and *ex parte*.

The Court has stated it intends to proceed next to decide the question of plaintiffs' standing. As matters stand now, the Court will be faced with poring through the voluminous classified discovery responses of the government defendants alone and unaided. The Court will then have the obligation of critically dissecting that evidence; analyzing whether the government's characterizations and descriptions in the Rogers Declaration are sufficiently responsive, complete, and accurate in light of the other evidence both public and secret; developing and elaborating the strongest arguments for plaintiffs' standing based on that secret evidence; and identifying public evidence that rebuts or contradicts the secret evidence. This challenge is aggravated by the government defendants' failure to respond to each request for admission and interrogatory individually as required by the Federal Rules of Civil Procedure.

The Court is faced with a nearly impossible task. But section 2712(b)(4) of title 18 U.S.C. provides the Court with an alternative. Section 2712(b)(4) adopts the procedures of 50 U.S.C. section 1806(f) authorizing the disclosure of classified evidence to plaintiffs' counsel "under appropriate security procedures and protective orders . . . where such disclosure is necessary to make an accurate determination" of the issues before the Court. 50 U.S.C. § 1806(f).

For the reasons set forth below, secure disclosure to three of plaintiffs' counsel, under appropriate security procedures and protective orders (including security clearances), is necessary in order for the Court to make an accurate determination of plaintiffs' standing.

II. Statutory Background

Plaintiffs bring claims under section 2712 of title 18 U.S.C. for violations of the Wiretap Act (18 U.S.C. §§ 2510 et seq.), and the Stored Communications Act (18 U.S.C. §§ 2701 et seq.).

A subsection of section 2712, section 2712(b)(4), provides that "the provisions of section 106(f) [i.e., section 1806(f) of title 50] . . . shall be the exclusive means by which materials governed by those sections [i.e., classified information] may be reviewed." 18 U.S.C. § 2712(b)(4).

As the Court has ruled, section 2712(b)(4) adopts the procedures of section 1806(f) as the exclusive means for reviewing classified materials the government defendants submit in this case. ECF No. 347 at 1-2; ECF No. 340 at 2; ECF No. 153 at 2, 11-13, 15, 24. "The Court . . . specifically found that section 2712(b)(4) 'designat[es] Section 1806(f) as "the exclusive means by which materials [designated as sensitive by the government] shall be reviewed' in suits against the United States under FISA, the Wiretap Action, and the Electronic Privacy Protection Act.'" ECF No. 340 at 2 (bracketed material original).

By its "exclusive means" language, section 2712(b)(4) mandates that the procedures of section 1806(f) govern the district court's review of classified materials for any purpose, including determining plaintiffs' standing. Section 2712(b)(4)'s use of section 1806(f)'s procedures is not limited simply to determining the legality of the surveillance.

This motion for access to classified discovery materials proceeds from section 2712(b)(4)'s statutory authorization of such access. Under the procedures of section 1806(f) that section

2712(b)(4) adopts, the Court reviews *ex parte, in camera* the classified materials provided by the Government. In addition, "the court may disclose to the aggrieved person, under appropriate security procedures and protective orders, portions of the application, order, or other materials relating to the surveillance only where such disclosure is necessary to make an accurate determination." 50 U.S.C. § 1806(f).

III. Discovery History And Present Status

A. Discovery History

At the May 2017 case management conference, the Court ordered plaintiffs to serve revised discovery focused on standing and for the government defendants to respond to plaintiffs' discovery. 5/19/17 RT at 67:23 to 69:16, 70:22 to 74:10; ECF No. 356. Concurrently, the Court imposed on the government defendants the independent obligation of marshalling all of the evidence they possessed relevant to plaintiffs' standing and presenting that evidence to the Court. 5/19/17 RT at 7:25 to 8:3, 49:1-20, 51:21 to 52:10, 70:22 to 74:10; ECF No. 356.

Plaintiffs served revised sets of interrogatories, requests for admission, and document requests on the government defendants on June 19, 2017. The parties then met and conferred; plaintiffs further narrowed and clarified their requests and on July 11, 2017 served further revised sets of interrogatories, requests for admission, and document requests. ECF No. 379-1, Exs. A, B, C. Plaintiffs' further revised sets of July 11, 2017 are the currently operative discovery requests.

At the May 2017 CMC, the Court originally set a deadline of August 9, 2017 for the government defendants to respond to plaintiffs' discovery requests and to the Court's order that they marshal all the standing-related evidence. ECF No. 356. The government defendants were unable to meet the August 2017 deadline and requested a two-month extension to October 6, 2017, which plaintiffs stipulated to and the Court granted. ECF No. 378.

A few days before the October 6, 2017 deadline, the government moved for an open-ended extension with no firm deadline for it to respond to the court-ordered discovery. ECF No. 379. The government defendants also disclosed that they had defaulted on their evidence preservation obligations. ECF No. 379-2. For a decade, starting in the predecessor *Hepting* litigation and continuing in this lawsuit, the government defendants had submitted declarations stating that they

had been preserving magnetic tapes containing results of Internet content surveillance conducted under the President's Surveillance Program ("PSP"). It turns out that the government long ago deleted those PSP Internet content tapes. ECF Nos. 379-2, 386-2. The government defendants are attempting to restore the data deleted from those tapes. ECF No. 386-2.

The Court granted the government defendants an extension of the discovery deadline to January 22, 2018. ECF No. 384. The government defendants were unable to meet this deadline, and plaintiffs stipulated to and the Court granted a further extension to February 16, 2018, with the exception of certain searches that were to be completed by April 1, 2018. ECF No. 387.

B. Present Status Of Discovery

The government served and filed its public written responses to plaintiffs' interrogatories, requests for admission, and document requests on February 16, 2018. ECF Nos. 388, 388-1 (Appendix A). These public responses contain no new information regarding plaintiffs' standing. With relatively few exceptions, the government's written discovery responses contain no substantive information whatsoever, only objections. To the extent they do contain substantive information, that information is not new but is merely a paraphrase of information previously disclosed by the government in the PCLOB Section 702 Report or elsewhere. *Compare, e.g.*, ECF 388-1at 39, (Govt. Defs. Resp. to Interrog. No. 22) *with* ECF No. 262 at 11-12 (PCLOB Section 702 Report at 36-37).

The government defendants have represented in their public responses that, notwithstanding their objections, in their classified submissions they are responding fully to plaintiffs' discovery requests and not withholding any evidence on the basis of their objections. But it appears the government defendants have not answered each interrogatory "*separately* and fully in writing under oath." Fed. R. Civ. Pro. 33(b)(3) (italics added). They also have not separately for each request for admission either admitted the request fully, or specifically denied the request, or explained in detail why it cannot truthfully admit or deny it. Fed. R. Civ. Pro. 36(a)(4).

Instead, the government defendants have made an unorthodox and unauthorized substitution of a classified declaration by NSA Director Rogers for the separate and individual responses to each interrogatory and RFA that the Federal Rules require. ECF Nos. 388, 389,

389-1, 389-2, 389-3. The Rogers Declaration combines groups of interrogatories and RFAs and then gives a narrative response to them. For example, it agglomerates its responses to 10 RFAs and six interrogatories into nine numbered paragraphs covering three pages (one of these paragraphs (¶ 83) is a non-substantive discussion of the government's deletion of PSP Internet content data). Rogers Decl. ¶¶ 78-86 (ECF No. 389-2). The heavily redacted public version of the Rogers Declaration does not disclose any new information relevant to standing.

Regarding document production, the government defendants have produced no documents to plaintiffs, even in redacted form. The government defendants have represented to plaintiffs that "Responsive documents will be available for the Court's review at a secure facility upon appropriate notice and with appropriate coordination of the DOJ's CISO." (4/12/18 email from government counsel Patton to plaintiffs' counsel Wiebe). Counsel for the government defendants has stated that the page count for the classified documents they have produced is in the thousands.

Some discovery yet remains outstanding, even though the deadline for responding has passed. The government defendants have not completed their efforts to restore the PSP Internet content tapes that they erased and have not yet begun to search those tapes for responsive information. Once they conduct those searches, the results also will be classified and provided to the Court *in camera* and *ex parte*. (4/12/18 email from Patton to Wiebe).

IV. Granting Plaintiffs' Counsel Access To The Classified Discovery Materials Is Necessary So That The Court Can Make An Accurate Determination Of Plaintiffs' Standing

Section 2712(b)(4) permits the Court to grant plaintiffs' counsel secure access to the classified discovery materials if, after personally reviewing the materials, the Court finds that access is necessary in order for the Court to make an accurate determination of plaintiffs' standing. 18 U.S.C. § 2712(b)(4); 50 U.S.C. § 1806(f); *see U.S. v. Daoud*, 755 F.3d 479, 481-82 (7th Cir. 2014) (after *ex parte, in camera* review, court can order disclosure under section 1806(f) if it expressly determines disclosure is "necessary"). This is the rare case in which access by plaintiffs' counsel is not just helpful but necessary in order for the Court to accurately determine plaintiffs' standing.

The necessity arises from the volume and complexity of the classified discovery materials,

the technical nature of the surveillance methods used by the government, the changes in the government's surveillance programs over the 16 years of their existence, and the need to critically examine the assertions made in the Rogers Declaration against both the classified and the public evidence.

If the government defendants have responded fully and in good faith to plaintiffs' discovery requests and, as they represent, have not withheld any evidence on the basis of their objections, then the documents they have produced and the information contained in the Rogers Declaration are voluminous and complex. At the May 2017 CMC, counsel for the government defendants predicted that their discovery responses would be "voluminous." 5/19/17 RT at 50:3. They have since confirmed their document production amounts to thousands of pages.

Determining how plaintiffs' communications and communications records were affected by the government's various surveillance methods over the past 16 years will require a close and critical examination of the classified evidence the government has submitted, technical analysis of the government's surveillance methods, the identification of gaps and inconsistencies in the government's evidence, and the development and presentation of additional evidence that provides context or rebuts the government's evidence. All of this evidence must then be organized and presented within the framework of plaintiffs' arguments demonstrating their standing. The burden of these tasks will fall solely on the Court unless it determines that the participation of plaintiffs' counsel is necessary in order for the Court to make an accurate determination of standing.

As a practical matter, the Court lacks the time and resources necessary to undertake this burdensome endeavor. At the May 2017 CMC, the Court discussed the burdens that even its limited review of the previously-submitted classified declarations has imposed in the past. 5/19/17 RT at 49:1-20. The burdens the Court faces now are far greater given the volume and complexity of the classified discovery materials now before it.

The task before the Court is immense. Accurately assessing plaintiffs' standing in light of the classified evidence requires a grounding in both the technological aspects of Internet communications as well as a working knowledge of the publicly available evidence. Moreover, there are different programs with different names that took place under different legal

authorizations at different times over the past 16 years. Each program featured devices and methods of varying technological design and evolved over time. And then, having analyzed the evidence, the Court will have to speculate about what plaintiffs' arguments regarding the classified evidence might be and then revert to the role of an independent decisionmaker to adjudicate those arguments. Reviewing the discovery responses in light of the relevant technology and public disclosures and then making plaintiffs' arguments for them is an impracticable task for a busy federal district court judge already burdened with handling many hundreds of active cases.

In an ordinary case, the parties assist the Court in making accurate determinations by reviewing and analyzing the mass of evidence, selecting the most relevant portions, presenting the evidence in the appropriate factual and legal context, and rebutting the inferences the opposing party seeks to draw from the evidence. But in this case the Court's "exhortation, if you will, that as much as can be submitted to the Court and plaintiffs' counsel unclassified . . . so that the plaintiffs can frame their arguments and make their record to this Court and to any other court" was fruitless. 5/19/17 RT at 46:15-19. Because the government defendants' public discovery responses contain no new information regarding plaintiffs' standing, plaintiffs cannot assist the Court unless they are given access to the voluminous classified discovery materials containing, as the Court directed, "all the evidence" relating to plaintiffs' standing. *Id*. at 49:19-20.

The Court's task is made even more burdensome by the government defendants' failure to answer each RFA and interrogatory individually as required by the Federal Rules. Because the government defendants apparently have not responded to plaintiffs' discovery on an interrogatory-by-interrogatory, request-by-request basis as the Federal Rules require, the Court therefore must parse through a line-by-line comparison of the Rogers Declaration with plaintiffs' interrogatories and RFAs to determine whether plaintiffs' discovery requests have even been answered, and then compel supplemental responses if the responses are incomplete or missing. The necessary line-by-line comparison between the responses and the requests will be close, detailed, and painstaking work. That comparison, together with the additional background research necessary to provide context for the requests and responses, will require time and resources that the Court realistically cannot feasibly devote in light of its other responsibilities.

An additional burden the Court will face if plaintiffs are not given access is evaluating plaintiffs' request for an adverse evidentiary inference in light of the government defendants' new revelation that they deleted evidence they had promised to preserve. *See* ECF Nos. 374, 379-2, 386-2. Making that evaluation will require a precise understanding of what evidence the government has deleted, what it has been able to restore, and the impact of that destruction in light of the remaining body of classified and public evidence. This, too, is a task that the Court cannot feasibly perform unaided.

It is telling to contrast the magnitude of the task facing the Court here with the much more circumscribed inquiry a district court faces when determining the lawfulness of surveillance conducted under a traditional FISA warrant. A traditional FISA warrant targets surveillance of a specific person using specific communications facilities. Before the FISC issues a traditional FISA warrant, it is presented with a warrant application and supporting affidavits. Determining the lawfulness of a traditional FISA warrant by reviewing the adequacy of the warrant application and supporting affidavits is the same process that a court performs when reviewing an ordinary criminal warrant, either when issuing a warrant in the first instance or when deciding a suppression motion in criminal proceedings. *See Daoud*, 755 F.3d at 482, 484-85 (access was not warranted where district judge concluded she was capable of determining by herself the legality of the traditional FISA warrant at issue). No doubt this Court has performed that task hundreds of times.

But no court has ever performed anything like the task that this Court would be required to undertake if it proceeds to review the classified evidence *ex parte* and *in camera*, without any assistance. No case has ever been like this one: At issue here are *mass* surveillance programs conducted over a 16-year period that intercept and search the communications and communications records of hundreds of millions of persons, not narrowly targeted surveillance conducted under a traditional FISA warrant. Unraveling the technology by which the government has conducted its various forms of surveillance over the years is a crucial task in determining how the surveillance has impacted plaintiffs, and it is not a task the Court is equipped to do on its own alone and unaided. The other tasks, including sorting out and organizing an understanding of the shifting scope and methods of the various surveillance programs over time and critically challenging and

questioning the government defendants' assertions about the surveillance they have conducted, are likewise ones the Court is ill equipped to perform.

The result will be better, and more accurate, if the Court does what a court does best: act as an independent decisionmaker. Courts have long recognized that accurate determinations of matters based on complex and voluminous factual records requires that the parties have access to all of the evidence put before the adjudicator. We have an adversary system, where each party meets the evidence and arguments of the other party with evidence and arguments of its own. That adversary method is necessary here in order to accurately determine plaintiffs' standing.

Essential to our adversary system and the due process principles that underlie it is the understanding that it is the parties and not the court that are in the best position to assess the evidence relevant to the dispute, to present that evidence in the way that best supports the arguments they are making, and to challenge and rebut the evidence relied upon by their opponents. Given the complexity and volume of the evidence here, the Court as adjudicator can make an accurate determination of plaintiffs' standing only if plaintiffs' counsel are allowed access to the evidence so that they can perform these tasks.

The linkage between the parties' access to the evidence and the accuracy of the resulting judicial decision is fundamental. "[O]ur adversary system presupposes [that] accurate and just results are most likely to be obtained through the equal contest of opposed interests . . . ." *Lassiter v. Dep't of Social Services*, 452 U.S. 18, 28 (1981). When a party is denied "the right to be informed not only of the nature of the charges but also of the substance of the relevant supporting evidence," it creates "an unacceptable risk of erroneous decisions." *Brock v. Roadway Express, Inc.*, 481 U.S. 252, 264-65 (1987).

Accordingly, "the evidence used to prove the Government's case must be disclosed to the individual so that he has an opportunity to show that it is untrue." *Goldberg v. Kelly*, 397 U.S. 254, 270 (1970). "Fairness can rarely be obtained by secret, one-sided determination of facts decisive of rights. Secrecy is not congenial to truth-seeking . . . . No better instrument has been devised for arriving at truth than to give a person in jeopardy of serious loss notice of the case against him and opportunity to meet it." *Goss v. Lopez*, 419 U.S. 565, 580 (1975) (ellipsis, brackets, and internal

quotation marks omitted). Even the most "rudimentary precautions against unfair or mistaken findings" require an "explanation of the evidence the authorities have." *Id*. at 581.

The Supreme Court has affirmed that adversary proceedings can be essential to accurately determining claims of unlawful electronic surveillance in cases where a court is faced with voluminous and complex factual materials: "The[] superiority [of adversary proceedings to *ex parte* proceedings] as a means for attaining justice in a given case is nowhere more evident than in those cases, such as the ones at bar, where an issue must be decided on the basis of a large volume of factual materials, and after consideration of the many and subtle interrelationships which may exist among the facts reflected by these records. As the need for adversary inquiry is increased by the complexity of the issues presented for adjudication, and by the consequent inadequacy of *ex parte* procedures as a means for their accurate resolution, the displacement of well-informed advocacy necessarily becomes less justifiable. [¶] Adversary proceedings will not magically eliminate all error, but they will substantially reduce its incidence by guarding against the possibility that the trial judge, through lack of time or unfamiliarity with the information contained in and suggested by the materials, will be unable to provide the scrutiny which the Fourth Amendment exclusionary rule demands." *Alderman v. U.S.*, 394 U.S. 165, 183-84 (1969). In adopting section 2712(b)(4), Congress similarly recognized that there would be cases where access by the plaintiff to classified materials would be necessary in order for the court to reach an accurate determination of the issues before it.

This legal authority amply reinforces the conclusion dictated by the circumstances of this case and the Court's own *ex parte, in camera* review of the classified discovery materials: the Court can accurately determine plaintiffs' standing only if plaintiffs' counsel are given secure access to the classified evidence so that they may analyze and explain that evidence, use it in support of their arguments, counter the government defendants' arguments based on that evidence, and supplement, explain, or rebut that evidence with public evidence.

V. Conclusion

The Court should grant three of plaintiffs' counsel access, under appropriate security procedures and protective orders (including security clearances), to the classified discovery

materials submitted by the government defendants.

DATE: May 7, 2018

Respectfully submitted,

/s/ *Thomas E. Moore III*
Thomas E. Moore III

CINDY COHN
DAVID GREENE
LEE TIEN
KURT OPSAHL
JAMES S. TYRE
MARK RUMOLD
ANDREW CROCKER
JAMIE L. WILLIAMS
ELECTRONIC FRONTIER FOUNDATION

RICHARD R. WIEBE
LAW OFFICE OF RICHARD R. WIEBE

THOMAS E. MOORE III
ROYSE LAW FIRM, PC

RACHAEL E. MENY
BENJAMIN W. BERKOWITZ
PHILIP J. TASSIN
KEKER, VAN NEST & PETERS LLP

ARAM ANTARAMIAN
LAW OFFICE OF ARAM ANTARAMIAN

Attorneys for Plaintiffs