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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

BANK JULIUS BAER & CO. LTD, A Swiss
entity; and JULIUS BEAR BANK AND
TRUST CO., a Cayman Islands entity,

Plaintiffs,

v.

WIKILEAKS, an entity of unknown form,
WIKILEAKS.ORG, an entity of unknown
form, DYNADOT, LLC a California limited
liability company, and DOES 1 through 10
inclusive,

Defendants.

No. CV08-0824 JSW

**MOTION FOR ADMINISTRATIVE
RELIEF (Local Rule 7-11);
DECLARATION OF KARL OLSON**

Date: February 29, 2008
Time: 9:00 a.m.
Place: Courtroom 2

1 Public Citizen and the California First Amendment Coalition, as proposed intervenors
2 and/or *amici curiae*, hereby file this administrative motion pursuant to Local Rule 7-11
3 permitting the filing of their Brief in Opposition to Injunctive Relief and in Support of Dismissal
4 for Lack of Subject Matter Jurisdiction.

5 As set forth below and in the following Declaration of Karl Olson, the compressed
6 schedule attendant upon plaintiffs' request for injunctive relief, and the fact that counsel was
7 retained a very short time ago, makes it impossible to comply with the regularly-scheduled time
8 frame for motions under Local Rules 7-2 and 7-3. Public Citizen and the California First
9 Amendment Coalition respectfully submit that they have a valuable perspective to add in this
10 matter and accordingly respectfully request that this administrative motion under Local Rule 7-11
11 be granted.

12
13 **DECLARATION OF KARL OLSON (Local Rule 7-11(a))**

14 1. I, Karl Olson, am a member in good standing of the State Bar of California and of
15 this Court, and am a partner at Levy, Ram & Olson, counsel of record for proposed
16 intervenors/*amici curiae* Public Citizen and California First Amendment Coalition. I make this
17 declaration of personal knowledge and if called as a witness I could and would testify
18 competently to the facts stated herein.

19 2. I was retained by Public Citizen and the California First Amendment Coalition, on
20 a pro bono basis, late in the afternoon of February 25, 2008, four days before the February 29,
21 2008 hearing in this court. Given that and the compressed time frame attending the plaintiffs'
22 request for injunctive relief, it would be impossible to follow the time frame set forth in Local
23 Rules 7-2 and 7-3 for regularly-scheduled motions, hence this motion for administrative relief
24 permitting the filing of our papers three days before the February 29, 2008 hearing.

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**[PROPOSED] ORDER GRANTING
MOTION FOR ADMINISTRATIVE
RELIEF**

Date: February 29, 2008
Time: 9:00 a.m.
Place: Courtroom 2

1 Good cause having been shown, the Motion for Administrative Relief of Public Citizen
2 and California First Amendment Coalition is GRANTED and the court permits the filing of their
3 papers in Opposition to Injunctive Relief and in support of dismissal for lack of subject matter
4 jurisdiction.

5 Dated: February _____, 2008

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8 The Honorable Jeffrey S. White
9 Judge, United States District Court
Northern District of California
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