

1 Marcia Hofmann (250087)  
marcia@eff.org  
2 ELECTRONIC FRONTIER FOUNDATION  
454 Shotwell Street  
3 San Francisco, CA 94110  
Telephone: (415) 436-9333 x116  
4 Facsimile: (415) 436-9993

5 David L. Sobel (*pro hac vice pending*)  
sobel@eff.org  
6 ELECTRONIC FRONTIER FOUNDATION  
1875 Connecticut Ave. NW  
7 Suite 650  
Washington, DC 20009  
8 Telephone: (202) 797-9009 x104  
Facsimile: (202) 707-9066

9 Attorneys for Plaintiff  
10 ELECTRONIC FRONTIER FOUNDATION

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12 **UNITED STATES DISTRICT COURT**  
13 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
14 **SAN FRANCISCO DIVISION**

16 ELECTRONIC FRONTIER FOUNDATION, )  
17 Plaintiff, )  
18 v. )  
19 OFFICE OF THE DIRECTOR OF NATIONAL )  
20 INTELLIGENCE )  
21 and )  
22 DEPARTMENT OF JUSTICE, )  
23 Defendants. )

NO. 08-1023 JSW  
**RENOTICE OF MOTION FOR A  
PRELIMINARY INJUNCTION**  
[Motion for Preliminary Injunction, Points  
and Authorities in Support of Motion for  
Preliminary Injunction, Declaration of Marcia  
Hofmann, and Proposed Order Filed  
Separately, Docket Nos. 7, 8 and 9]  
Date: May 9, 2008  
Time: 9:00 a.m.  
Courtroom 2, 17th Floor

1 TO DEFENDANTS AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on May 9, 2008, at 9:00 a.m., or as soon thereafter as the  
3 matter may be heard in Courtroom 2 on the 17th Floor of the United States District Court for the  
4 Northern District of California, 450 Golden Gate Avenue, San Francisco, California, Plaintiff  
5 Electronic Frontier Foundation (“EFF”) will, and hereby does, move for an order granting  
6 preliminary injunctive relief.  
7

8 Pursuant to Federal Rule of Civil Procedure 65, EFF seeks to enjoin the Office of the  
9 Director of National Intelligence (“ODNI”) and the Department of Justice (“DOJ”) from impeding  
10 EFF’s efforts to expeditiously obtain agency records through the Freedom of Information Act  
11 concerning a lobbying campaign to amend federal surveillance law, particularly to insulate  
12 telecommunications carriers from liability for their cooperation in widespread and illegal  
13 government surveillance. EFF respectfully asks that this Court issue an order requiring Defendants  
14 to expedite the processing of EFF’s Freedom of Information Act requests, and to complete their  
15 processing within 10 days of the Court’s order. The motion is based on this notice of motion, the  
16 memorandum of points and authorities in support of the motion, the declaration of Marcia  
17 Hofmann and attached exhibits in support of the motion, and all papers and records on file with the  
18 Clerk or which may be submitted prior to or at the time of the hearing, and any further evidence  
19 which may be offered.  
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23 DATED: March 10, 2008

/s/ Marcia Hofmann  
24 Marcia Hofmann, Esq.  
ELECTRONIC FRONTIER FOUNDATION  
25 454 Shotwell Street  
San Francisco, CA 94110  
26 Telephone: (415) 436-9333  
Facsimile: (415) 436-9993  
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