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

17 FIRST UNITARIAN CHURCH OF LOS
 18 ANGELES, *et al.*,
 19 Plaintiffs,
 20 v.
 21 NATIONAL SECURITY AGENCY, *et al.*,
 22 Defendants.
 23

Case No: 3:13-cv-03287 JSW

**DECLARATION OF CONSTANCE
 KANE FOR UNITARIAN
 UNIVERSALIST SERVICE
 COMMITTEE IN SUPPORT OF
 PLAINTIFFS' MOTION FOR
 PARTIAL SUMMARY JUDGMENT**

Date: February 7, 2014
 Time: 9:00 A.M.
 Hon. Jeffrey S. White
 Courtroom 11 - 19th Floor

1 I, CONSTANCE KANE, hereby declare:

2 1. I am the Vice President and Chief Operating Officer of the Unitarian Universalist
3 Service Committee (“UUSC”). The facts contained in the following affidavit are known to me of
4 my own personal knowledge and if called upon to testify, I could and would competently do so.

5 2. Plaintiff UUSC partners with grassroots organizations that courageously confront
6 unjust systems and human rights violations.

7 3. As a membership organization that does not seek nor accept government funds,
8 UUSC is able to advocate for a broad range of justice-oriented public policies, some of which are
9 controversial. Often this work is done in active conflict zones or other sites of humanitarian disaster.
10 Additionally, our partners often represent marginalized populations, including survivors of torture,
11 many of whom fled persecution in their country of origin and have open asylum cases in the United
12 States; active military members organizing to protect and exercise their right to free speech; human
13 rights activists in countries with active conflict; and migrant workers in the informal economy who
14 are denied basic protections and rights due to their residency status. We carry out many of our
15 conversations with partners over the phone, as the organizations with which we work are spread
16 across the globe. We believe that these partners are now hesitant to contact our organization or to
17 speak freely as a result of the revelation of the NSA’s dragnet surveillance, including the bulk
18 acquisition, storage, and searching of telephone communications information.

19 4. Furthermore, because the people we work with are marginalized by definition,
20 knowledge of the work they are doing and who they are doing it with renders them extremely
21 vulnerable and even endangers them. Knowing that their calls are being monitored in any way has,
22 understandably, dissuaded them from working with us and other partners. This significantly inhibits
23 our ability to effectively carry out our mission of promoting social justice.

24 5. UUSC is a telephone subscriber of Comcast.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November __, 2013 at Cambridge, Massachusetts.

CONSTANCE KANE

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 1, 2013 at Cambridge, Massachusetts.

Constance Kane
CONSTANCE KANE