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14	UNITED STATES 1	DISTRICT COURT
15	NORTHERN DISTRI	CT OF CALIFORNIA
16		
17	FIRST UNITARIAN CHURCH OF LOS	Case No: 3:13-cv-03287 JSW
18	ANGELES, et al.,	
19	Plaintiffs,	DECLARATION OF CONSTANCE KANE FOR UNITARIAN
20	V.	UNIVERSALIST SERVICE COMMITTEE IN SUPPORT OF
21		PLAINTIFFS' MOTION FOR
22	NATIONAL SECURITY AGENCY, et al.,	PARTIAL SUMMARY JUDGMENT
22	Defendants.	
23 24		Date: February 7, 2014
		Time: 9:00 A.M. Hon. Jeffrey S. White
25		Courtroom 11 - 19th Floor
26		
27		
28		FARIAN UNIVERSALIST SERVICE COMMITTEE ISO
	DECLARATION OF CONSTANCE KANE FOR UNITARIAN UNIVERSALIST SERVICE COMMITTEE ISO PLAINTIFFS' MSJ	

I, CONSTANCE KANE, hereby declare:

I am the Vice President and Chief Operating Officer of the Unitarian Universalist
 Service Committee ("UUSC"). The facts contained in the following affidavit are known to me of
 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 States; active military members organizing to protect and exercise their right to free speech; human 12 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 across the globe. We believe that these partners are now hesitant to contact our organization or to 16 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.

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

UUSC is a telephone subscriber of Comcast.

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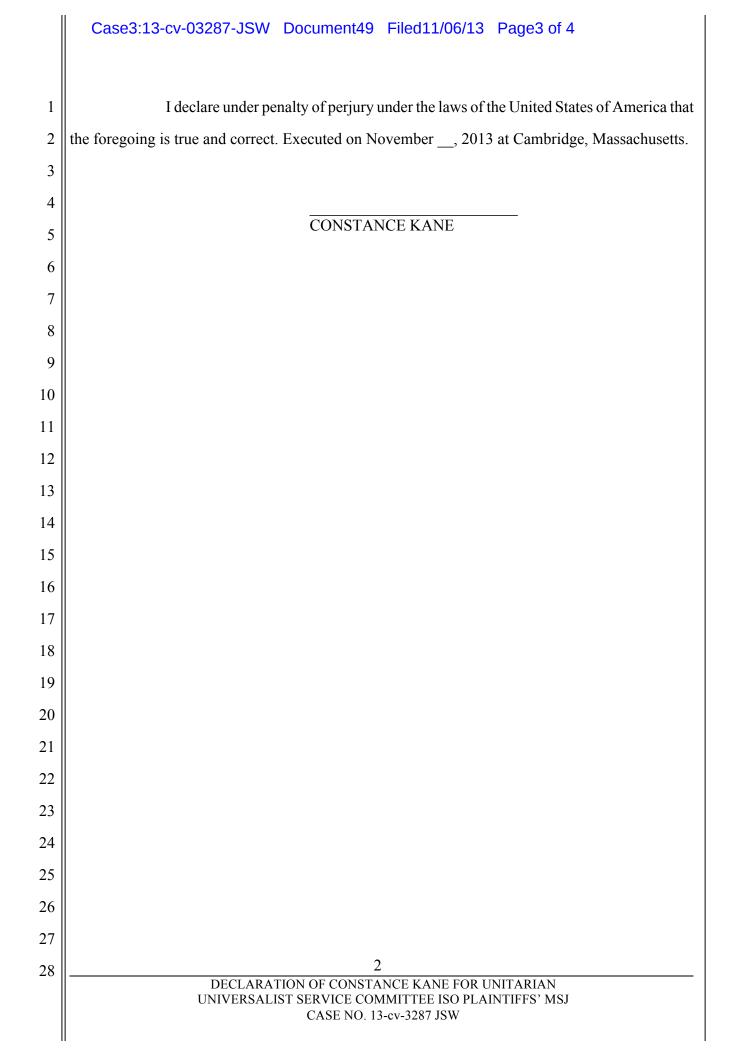
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1	I declare under penalty of perjury under the laws of the United States of America that		
2	the foregoing is true and correct. Executed on November $\frac{1}{2}$, 2013 at Cambridge, Massachusetts.		
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4	Constance Kane		
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	DECLARATION OF CONSTANCE KANE FOR UNITARIAN UNIVERSALIST SERVICE COMMITTEE ISO PLAINTIFFS' MSJ CASE NO. 13-cv-3287 JSW		