

MAR 16 2020

LeeAnn Flynn Hall, Clerk of Court

UNITED STATES  
FOREIGN INTELLIGENCE SURVEILLANCE COURT OF REVIEW  
WASHINGTON, D.C.

IN RE OPINIONS & ORDERS BY THE FISC  
ADDRESSING BULK COLLECTION OF DATA  
UNDER THE FOREIGN INTELLIGENCE  
SURVEILLANCE ACT

Docket No. 20-01

**UNOPPOSED MOTION TO EXTEND TIME**

Pursuant to FISC Rule of Procedure 11(d), Movants respectfully ask this Court to extend by 30 days the time for responding to the Order to Show Cause dated March 13, 2020. The government has informed Movants that it does not oppose this motion.

This Court may extend time for “good cause,” FISC R. P. 11(d), and that standard is met here. Movants seek an extension in light of the personal and professional upheaval arising from the spread of COVID-19, a crisis that prompted the President to declare a national emergency on March 13, 2020. *See* Proclamation on Declaring a National Emergency Concerning the Novel Coronavirus Disease (COVID-19) Outbreak.<sup>1</sup> Due to the virus, Movants have now all closed their respective offices, and all counsel in this case are now working remotely. The transition to offsite work poses significant logistical and communication challenges which not only impede the attorneys’ ability to collaborate on this case but also require them to take on additional responsibilities to support their respective organizations—duties that reduce their capacity to respond to the Court’s order.

As the crisis continues, more obstacles are likely to arise. Already, four senior attorneys on this matter have started working part time to undertake unexpected childcare responsibilities

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<sup>1</sup> <https://www.whitehouse.gov/presidential-actions/proclamation-declaring-national-emergency-concerning-novel-coronavirus-disease-covid-19-outbreak/>

caused by school closures. Additional school closures, imposing additional childcare demands, may disrupt the ability of counsel to work on this matter and others even more. Further reducing Movants' capacity, Yale Law School—whose students provide essential support to Movant Media Freedom and Information Access Clinic—extended its spring break by a week to March 20, 2020, and announced that students will not be returning to campus this academic year.

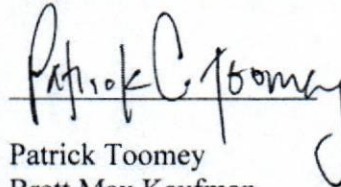
In the coming days, unplanned personal, professional, and communal obligations will undoubtedly arise. An extension would give Movants leeway to address these challenges while ensuring they have the time necessary to respond to the Court's order.

### **Conclusion**

For the foregoing reasons, Movants respectfully request that the Court extend the deadline for responding to the Order to Show Cause to Monday, April 27, 2020.

Dated: March 16, 2020

Respectfully submitted,



Patrick Toomey  
Brett Max Kaufman  
American Civil Liberties Union Foundation  
125 Broad Street, 18th Floor  
New York, NY 10004  
Phone: (212) 549-2500  
Fax: (212) 549-2654  
ptoomey@aclu.org

Arthur B. Spitzer  
Scott Michelman  
American Civil Liberties Union Foundation  
of the District of Columbia  
915 15th Street NW, 2nd Floor  
Washington, D.C. 20005



Phone: (202) 457-0800  
aspitzer@acludc.org

David Schulz  
Charles Crain  
Media Freedom & Information Access  
Clinic, Abrams Institute  
Yale Law School  
P.O. Box 208215  
New Haven, CT 06510  
Phone: (203) 436-5827  
Fax: (203) 432-3034  
david.schulz@ylsclinics.org

Alex Abdo  
Jameel Jaffer  
Knight First Amendment Institute at  
Columbia University  
475 Riverside Drive, Suite 302  
New York, NY 10115  
Phone: (646) 745-8500  
alex.abdo@knightcolumbia.org

**CERTIFICATE OF SERVICE**

I, Patrick Toomey, certify that on this day, March 16, 2020, a copy of the foregoing motion was served on the following persons by the methods indicated:

By email:

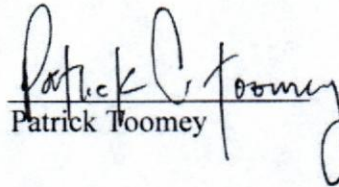
Daniel Hartenstine  
Litigation Security Group  
U.S. Department of Justice  
2 Constitution Square  
145 N Street, N.E. Suite 2W-115  
Washington, DC 20530  
Daniel.O.Hartenstine@usdoj.gov

By email:

Jeffrey Smith  
Counsel, Appellate Unit  
U.S. Department of Justice  
National Security Division  
950 Pennsylvania Ave., N.W.  
Washington, DC 20530  
Jeffrey.Smith5@usdoj.gov

By email:

Laura Donohue  
Georgetown University Law Center  
600 New Jersey Ave., N.W.  
Washington, DC 20001  
ldk@georgetown.edu

  
Patrick Toomey