

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

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WIKIMEDIA FOUNDATION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 1:15-cv-00662-TSE
	)	
NATIONAL SECURITY AGENCY, <i>et al.</i> ,	)	
	)	
Defendants.	)	

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**DEFENDANTS' MOTION TO COMPEL DISCOVERY**

Defendants National Security Agency (“NSA”) *et al.* hereby move pursuant to Federal Rule of Civil Procedure 37(a)(1) and District of Maryland Local Rule 104, to compel Plaintiff Wikimedia Foundation (“Wikimedia”) to respond to three discovery requests: Office of the Director of National Intelligence (“ODNI”) Interrogatory No. 14, ODNI Interrogatory No. 19, and Department of Justice Request for Production No. 1. As explained in the accompanying Memorandum of Points and Authorities in Support of Defendants’ Motion to Compel Discovery, filed today and incorporated herein by reference, these discovery requests seek significant information relevant to determining whether the Court has jurisdiction over Plaintiff’s claims. Plaintiff has interposed no valid objections to these discovery requests, and the Court therefore should order Plaintiff to respond to these requests by June 1, 2018, or another reasonable date certain.

Defendants’ counsel also hereby certifies pursuant to Federal Rule of Civil Procedure 37(a)(1) and applicable local rules that the parties have conferred in good faith regarding this discovery, and that Defendants are unable to obtain it without Court action.

Dated: March 26, 2018

Respectfully submitted,

CHAD A. READLER  
Acting Assistant Attorney General

ANTHONY J. COPPOLINO  
Deputy Branch Director

*/s/ James J. Gilligan*

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