IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

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

ERRATA TO THE DEFENDANTS' MEMORANDUM OF POINTS AND AUTHORITIES IN OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL DISCOVERY RESPONSES AND DEPOSITION TESTIMONY

Defendants submit this Errata, which accompanies a corrected version of Defendants' Memorandum of Points and Authorities in Opposition to Plaintiff's Motion to Compel Discovery Responses and Deposition Testimony, in order to detail the non-substantive differences between the versions of this submission, originally filed on April 28, 2018 (ECF No. 138), and a corrected version filed herewith:

1. The citations in footnote 8, on page 15, have been corrected as shown below:

Original Version of Footnote 8	Corrected Version of Footnote 8
See also Senate Agreement to the Conference Report on S. 2845, 108th Cong., 2d Session, at S11965 (December 8, 2004) ("The bill properly affords the DNI authority to protect intelligence sources and methods, but this is the same authority that is currently vested in the [DCI]"); House Agreement to H. Res. 870 and the Conference Report on S. 2845, 108th Cong., 2d Session, at H11004 (December 7, 2004) ("The bill vests the DNI with the authority to protect intelligence sources and methods, just as the [DCI] has exercised").	See also Senate Agreement to the Conf. Rep. on S. 2845, 150 Cong. Rec. S11939, S11965 (Dec. 8, 2004) ("The bill properly affords the DNI authority to protect intelligence sources and methods, but this is the same authority that is currently vested in the [DCI]"); House Agreement to H. Res. 870 and the Conf. Rep. on S. 2845, 150 Cong. Rec. H10994, H11004 (Dec. 7, 2004) ("The bill vests the DNI with the authority to protect intelligence sources and methods, just as the [DCI] has exercised").

Dated: June 28, 2018 Respectfully submitted,

CHAD A. READLER

Acting Assistant Attorney General

ANTHONY J. COPPOLINO Deputy Branch Director

JAMES J. GILLIGAN Special Litigation Counsel

RODNEY PATTON Senior Trial Counsel

/s/ Olivia Hussey Scott

JULIA A. BERMAN OLIVIA HUSSEY SCOTT

Trial Attorneys

U.S. Department of Justice

Civil Division, Federal Programs Branch

20 Massachusetts Avenue, N.W., Rm. 7309

Washington, D.C. 20001 Phone: (202) 616-8491

E-mail: Olivia.Hussey.Scott@usdoj.gov

Counsel for Defendants