

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

WIKIMEDIA FOUNDATION,

Plaintiff,

v.

NATIONAL SECURITY AGENCY, *et al.*,

Defendants.

Civil Action No. 1:15-cv-00662-TSE

Attachment D

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

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

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

WIKIMEDIA FOUNDATION,

Plaintiff,

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NATIONAL SECURITY AGENCY, *et al.*,

Defendants.

No. 1:15-cv-0662 (TSJ)

~~FILED UNDER SEAL~~

Declaration of James J. Gilligan

Pursuant to 28 U.S.C. § 1746, I, James J. Gilligan, hereby declare:

1. I am an attorney in the United States Department of Justice, Civil Division, Federal Programs Branch. I serve as lead counsel for the Government Defendants in the above-captioned case. The statements made herein are based on my personal knowledge, and on information made available to me in the course of my duties and responsibilities as Government counsel in this case.

2. I submit this declaration in support of the Defendants' concurrently-filed motion for summary judgment.

3. Filed as Exhibits 3-5 attached to the Defendants' motion for summary judgment are true and correct copies of the following documents:

Exhibit No.	Exhibit Name
3	Wikimedia Foundation, Inc.'s Amended and Supplemental Responses and Objections to NSA's First Set of Interrogatories, dated March 23, 2018
4	Wikimedia Foundation, Inc.'s Amended Responses and Objections to ODNI's Interrogatory No. 19, dated April 6, 2018, including Exhibit 1, "Technical Statistics Chart"
5	Wikimedia Foundation, Inc.'s Responses and Objections to NSA's First Set of Interrogatories, dated January 11, 2018

I declare under penalty of perjury that the foregoing is true and correct. Executed in Washington, D.C., this 13th day of November, 2018.



JAMES J. GILLIGAN
Special Litigation Counsel
United States Department of Justice
Civil Division, Federal Programs Branch