

**United States
Foreign Intelligence Surveillance Court**

In Re: Motions to Disclose
Aggregate Date regarding
FISA Orders

Case No. Misc 13-03;
13-04; 13-05; 13-06; 13-07

Motion for Leave for *Amicus* to Participate in Oral Argument

Now comes the *Amicus*, Michael Walsh, who moves this Honorable Court for leave to participate in oral argument. In these consolidated cases the Court has allowed several *Amici* to file briefs, including the ACLU and Dropbox. Both Google and Microsoft have, in their amended petitions, sought oral argument from the Court. The ACLU, the Electronic Frontier Foundation, and several related *Amici* have sought permission to join oral argument, although the Court has not yet granted argument in any of the consolidated cases. *Motion for Leave to Participate in Oral Argument* (filed October 10, 2013 in dockets 13-03 and 13-04).

Amicus Michael Walsh moves the Court for leave to participate in oral argument, if the Court chooses to grant any. Because the *Amicus* advances several arguments, not addressed by the parties or the *amici*, which bear directly upon the Court's ability to exercise jurisdiction in this case, his participation at oral argument will benefit the Court. Given recent congressional proposals to modify the Court and provide additional statutory authority and guidance, the *Amicus* will materially contribute to the Court's review of its own constitutional structure. The Senate Select Committee on Intelligence just recently reported out of committee a bill which, if enacted, would be called the FISA Improvement Act, and would provide for the Court to regularly appoint an *Amicus* for proceedings.

Respectfully Submitted,



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Certificate of Service

I, Michael C. Walsh, certify that I have served a copy of this motion and the proposed *amicus* brief by first class mail, postage prepaid, and by electronic mail as follows:

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Michael C. Walsh

I, Michael C. Walsh, further certify that I have served a copy of this motion and the proposed *amicus* brief upon the Parties, both by first class mail, postage prepaid, and by electronic mail as follows:

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