

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.

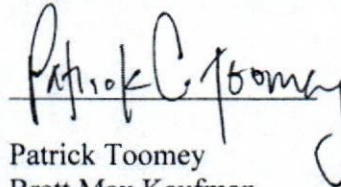
In the coming days, unplanned personal, professional, and communal obligations will undoubtedly arise. An extension would give Movants leeway to address these challenges while ensuring they have the time necessary to respond to the Court's order.

### **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,



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**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:

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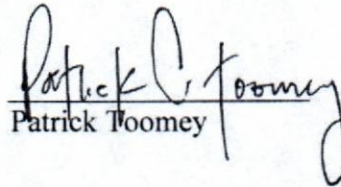
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