1	CINDY COHN (SBN 145997)	RACHAEL E. MENY (SBN 178514)
2	cindy@eff.org	rmeny@kvn.com
2	LEE TIEN (SBN 148216)	MICHAEL S. KWUN (SBN 198945)
3	KURT OPSAHL (SBN 191303)	BENJAMIN W. BERKOWITZ (SBN 244441)
	MATTHEW ZIMMERMAN (SBN 212423) MARK RUMOLD (SBN 279060)	KEKER & VAN NEST, LLP 633 Battery Street
4	DAVID GREENE (SBN 160107)	San Francisco, California 94111
5	JAMES S. TYRE (SBN 083117)	Tel.: (415) 391-5400; Fax: (415) 397-7188
	ELECTRONIC FRONTIER FOUNDATION	
6	815 Eddy Street	RICHARD R. WIEBE (SBN 121156)
7	San Francisco, CA 94109	wiebe@pacbell.net
,	Tel.: (415) 436-9333; Fax: (415) 436-9993	LAW OFFICE OF RICHARD R. WIEBE
8		One California Street, Suite 900
0	THOMAS E. MOORE III (SBN 115107)	San Francisco, CA 94111
9	tmoore@rroyselaw.com	Tel.: (415) 433-3200; Fax: (415) 433-6382
10	ROYSE LAW FIRM, PC 1717 Embarcadero Road	AD AM ANITAD AMIANI (CDNI 220070)
		ARAM ANTARAMIAN (SBN 239070)
11	Palo Alto, CA 94303 Tel.: 650-813-9700; Fax: 650-813-9777	aram@eff.org LAW OFFICE OF ARAM ANTARAMIAN
12	1 1cl., 050-815-9700, 1 ax. 050-815-9777	1714 Blake Street
12	Attorneys for Plaintiffs	Berkeley, CA 94703
13	7 tttorneys for Figure 113	Telephone: (510) 289-1626
		1010
14	UNITED STATES	DISTRICT COURT
	NORTHERN DISTRICT OF CALIFORNIA	
15	NORTHERN DISTRI	ICT OF CALIFORNIA
16		ICT OF CALIFORNIA SCO DIVISION
16	SAN FRANCI	SCO DIVISION Case No: 3:13-cv-03287 JSW
16 17 18	SAN FRANCI FIRST UNITARIAN CHURCH OF LOS ANGELES, et al.,	Case No: 3:13-cv-03287 JSW DECLARATION OF CONSTANCE
16 17	SAN FRANCI FIRST UNITARIAN CHURCH OF LOS	Case No: 3:13-cv-03287 JSW DECLARATION OF CONSTANCE KANE FOR UNITARIAN
16 17 18 19	SAN FRANCI FIRST UNITARIAN CHURCH OF LOS ANGELES, et al., Plaintiffs,	Case No: 3:13-cv-03287 JSW DECLARATION OF CONSTANCE KANE FOR UNITARIAN UNIVERSALIST SERVICE
16 17 18	SAN FRANCI FIRST UNITARIAN CHURCH OF LOS ANGELES, et al.,	Case No: 3:13-cv-03287 JSW DECLARATION OF CONSTANCE KANE FOR UNITARIAN UNIVERSALIST SERVICE COMMITTEE IN SUPPORT OF
16 17 18 19	SAN FRANCI FIRST UNITARIAN CHURCH OF LOS ANGELES, et al., Plaintiffs, v.	Case No: 3:13-cv-03287 JSW DECLARATION OF CONSTANCE KANE FOR UNITARIAN UNIVERSALIST SERVICE COMMITTEE IN SUPPORT OF PLAINTIFFS' MOTION FOR
16 17 18 19 20 21	SAN FRANCI FIRST UNITARIAN CHURCH OF LOS ANGELES, et al., Plaintiffs,	Case No: 3:13-cv-03287 JSW DECLARATION OF CONSTANCE KANE FOR UNITARIAN UNIVERSALIST SERVICE COMMITTEE IN SUPPORT OF
16 17 18 19 20	SAN FRANCI FIRST UNITARIAN CHURCH OF LOS ANGELES, et al., Plaintiffs, v. NATIONAL SECURITY AGENCY, et al.,	Case No: 3:13-cv-03287 JSW DECLARATION OF CONSTANCE KANE FOR UNITARIAN UNIVERSALIST SERVICE COMMITTEE IN SUPPORT OF PLAINTIFFS' MOTION FOR
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16 17 18 19 20 21	SAN FRANCI FIRST UNITARIAN CHURCH OF LOS ANGELES, et al., Plaintiffs, v. NATIONAL SECURITY AGENCY, et al.,	Case No: 3:13-cv-03287 JSW DECLARATION OF CONSTANCE KANE FOR UNITARIAN UNIVERSALIST SERVICE COMMITTEE IN SUPPORT OF PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT
16 17 18 19 20 21 22	SAN FRANCI FIRST UNITARIAN CHURCH OF LOS ANGELES, et al., Plaintiffs, v. NATIONAL SECURITY AGENCY, et al.,	Case No: 3:13-cv-03287 JSW DECLARATION OF CONSTANCE KANE FOR UNITARIAN UNIVERSALIST SERVICE COMMITTEE IN SUPPORT OF PLAINTIFFS' MOTION FOR
16 17 18 19 20 21 22 23 24	SAN FRANCI FIRST UNITARIAN CHURCH OF LOS ANGELES, et al., Plaintiffs, v. NATIONAL SECURITY AGENCY, et al.,	Case No: 3:13-cv-03287 JSW DECLARATION OF CONSTANCE KANE FOR UNITARIAN UNIVERSALIST SERVICE COMMITTEE IN SUPPORT OF PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT Date: February 7, 2014 Time: 9:00 A.M. Hon. Jeffrey S. White
16 17 18 19 20 21 22 23	SAN FRANCI FIRST UNITARIAN CHURCH OF LOS ANGELES, et al., Plaintiffs, v. NATIONAL SECURITY AGENCY, et al.,	Case No: 3:13-cv-03287 JSW DECLARATION OF CONSTANCE KANE FOR UNITARIAN UNIVERSALIST SERVICE COMMITTEE IN SUPPORT OF PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT Date: February 7, 2014 Time: 9:00 A.M.
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I, CONSTANCE KANE, hereby declare:

- I am the Vice President and Chief Operating Officer of the Unitarian Universalist Service Committee ("UUSC"). The facts contained in the following affidavit are known to me of my own personal knowledge and if called upon to testify, I could and would competently do so.
- 2. Plaintiff UUSC partners with grassroots organizations that courageously confront unjust systems and human rights violations.
- 3. As a membership organization that does not seek nor accept government funds, UUSC is able to advocate for a broad range of justice-oriented public policies, some of which are controversial. Often this work is done in active conflict zones or other sites of humanitarian disaster. Additionally, our partners often represent marginalized populations, including survivors of torture, many of whom fled persecution in their country of origin and have open asylum cases in the United States; active military members organizing to protect and exercise their right to free speech; human rights activists in countries with active conflict; and migrant workers in the informal economy who are denied basic protections and rights due to their residency status. We carry out many of our conversations with partners over the phone, as the organizations with which we work are spread across the globe. We believe that these partners are now hesitant to contact our organization or to speak freely as a result of the revelation of the NSA's dragnet surveillance, including the bulk acquisition, storage, and searching of telephone communications information.
- 4. Furthermore, because the people we work with are marginalized by definition, knowledge of the work they are doing and who they are doing it with renders them extremely vulnerable and even endangers them. Knowing that their calls are being monitored in any way has, understandably, dissuaded them from working with us and other partners. This significantly inhibits our ability to effectively carry out our mission of promoting social justice.
 - 5. UUSC is a telephone subscriber of Comcast.

Case3:13-cv-03287-JSW Document49 Filed11/06/13 Page3 of 4 I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November ___, 2013 at Cambridge, Massachusetts. CONSTANCE KANE DECLARATION OF CONSTANCE KANE FOR UNITARIAN UNIVERSALIST SERVICE COMMITTEE ISO PLAINTIFFS' MSJ

CASE NO. 13-cv-3287 JSW

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1	I declare under penalty of perjury under the laws of the United States of America that		
2	the foregoing is true and correct. Executed on November <u>1</u> , 2013 at Cambridge, Massachusetts.		
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28	DECLARATION OF CONSTANCE KANE FOR UNITARIAN		
	UNIVERSALIST SERVICE COMMITTEE ISO PLAINTIFFS' MSJ CASE NO. 13-cv-3287 JSW		