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 AT&T CORP. and AT&T INC.

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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA

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SAN FRANCISCO DIVISION

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19 TASH HEPTING, GREGORY HICKS,
 CAROLYN JEWEL and ERIK KNUTZEN
 20 on Behalf of Themselves and All Others
 Similarly Situated,

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Plaintiffs,

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vs.

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24 AT&T CORP., AT&T INC. and DOES 1-20,
 inclusive,

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Defendants.

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No. C-06-0672-VRW

**DECLARATION OF BRUCE A.
 ERICSON IN SUPPORT OF
 OPPOSITION OF DEFENDANT
 AT&T CORP. TO MOTION OF
 LYCOS, INC. AND WIRED NEWS
 FOR ORDERS PERMITTING
 INTERVENTION AND UNSEALING
 DOCUMENTS
 [DKT. 139]**

Courtroom: 6, 17th Floor
 Judge: Hon. Vaughn R. Walker
 Hearing: June 23, 2006
 Time: 9:30 a.m.

1 I, **BRUCE A. ERICSON**, declare as follows:

2 1. I am an attorney licensed to practice law in the State of California and
3 admitted to practice before this Court, and am a partner of the law firm of Pillsbury
4 Winthrop Shaw Pittman LLP, counsel for defendant **AT&T CORP.** (“AT&T”). Except for
5 those matters stated on information and belief, which I believe to be true, I have personal
6 knowledge of the facts stated herein and, if called as a witness, I could and would
7 competently testify thereto.

8 2. On January 31, 2006, Wired News (“Wired”) published on its website an
9 article entitled “AT&T Sued Over NSA Eavesdropping.” A true and correct copy of the
10 article is attached hereto as Exhibit A.

11 3. On April 7, 2006, Wired published on its website an article entitled
12 “Whistle-Blower Out's NSA Spy Room.” A true and correct copy of the article is attached
13 hereto as Exhibit B.

14 4. On April 7, 2006, Wired published on its website an article entitled
15 “Wiretap Whistle-Blower's Account.” A true and correct copy of the article is attached
16 hereto as Exhibit C.

17 5. On April 12, 2006, Wired published on its website an article entitled
18 “AT&T Seeks to Hide Spy Docs.” A true and correct copy of the article is attached hereto
19 as Exhibit D.

20 6. On May 2, 2006, Wired published on its website an article entitled “Feds
21 Go All Out to Kill Spy Suit.” A true and correct copy of the article is attached hereto as
22 Exhibit E.

23 7. On May 17, 2006, Wired published on its website an article entitled
24 “Stumbling Into a Spy Scandal.” A true and correct copy of the article is attached hereto as
25 Exhibit F.

26 8. On May 17, 2006, Wired published on its website an article entitled “AT&T
27 Whistle-Blower's Evidence.” A true and correct copy of the article is attached hereto as
28 Exhibit G.

1 9. On May 17, 2006, Wired published on its website an article entitled “Court
2 Deals AT&T a Setback.” A true and correct copy of the article is attached hereto as
3 Exhibit H.

4 10. On May 22, 2006, Wired published on its website an article entitled
5 “Whistle-Blower’s Evidence, Uncut.” A true and correct copy of the article (including a
6 hyperlinked .pdf described as “the complete file”) is attached hereto as Exhibit I.

7 11. On May 22, 2006, Wired published on its website an article entitled “Why
8 We Published the AT&T Docs.” A true and correct copy of the article is attached hereto as
9 Exhibit J.

10 12. On May 25, 2006, Wired published on its website an article entitled “Court
11 Filing Confirms Spy Docs.” A true and correct copy of the article is attached hereto as
12 Exhibit K.

13 I declare under penalty of perjury that the foregoing is true and correct.

14 Executed on June 12, 2006, at San Francisco, California.

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/s/ Bruce A. Ericson
Bruce A. Ericson