

**U.S. Department of Justice**

Civil Division, Federal Programs Branch

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June 21, 2006

BY FACSIMILEJeffery N. Lüthi
Clerk of the Panel
Judicial Panel on Multidistrict Litigation
One Columbus Circle, NE
Thurgood Marshall Federal Judiciary Bldg.
Room G-255, North Lobby
Washington, DC 20002RE: MDL-1791 – In re National Security Agency Telecommunications Records Litigation

Dear Mr. Lüthi:

On June 19, 2006, the United States filed its Motion for Transfer and Coordination Pursuant to 28 U.S.C. § 1407 to Add Actions to MDL 1791 and Response to Verizon's Motion for Transfer and Coordination, supporting memorandum, and a schedule of added actions. This letter is to request that the Judicial Panel on Multidistrict Litigation consider our filing as a response to Verizon Communications Inc., Verizon Global Networks Inc., and Verizon Northwest Inc.'s Motion for Transfer and Coordination Pursuant to 28 U.S.C. § 1407 ("Verizon's Motion") and that the five added actions set forth in our filing be considered as related or "tag-along" actions to MDL-1791.

Please be advised that the United States refers to the named defendants George W. Bush and the National Security Agency in *Mayer et al. v. Verizon Communications Inc. et al.*, No. 1:06-cv-03650-LBS (S.D. NY), one of the actions subject to Verizon's Motion. The United States has also moved to intervene in *Hepting et al. v. AT&T Corp. et al.*, No. C-06-0672-JCS (N.D. Cal.), another action subject to Verizon's Motion.

Feel free to contact me at 202-514-4504 if you need any additional information. Thank you for your attention to this matter.

Sincerely,

/s/

Renée S. Orleans

cc: Panel Attorney Service List

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the United States' June 21, 2006 Letter to Jeffery N. Lüthi, Clerk of the Panel, Judicial Panel on Multidistrict Litigation, has been delivered via first-class mail on June 21, 2006, to the addresses identified on the attached service list.

/s/
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American Civil Liberties Union, et al v. National Security Agency/Central Security Service, et al
Civil Action No. 2:06-cv-10204-ADT-RSW

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Center for Constitutional Rights, et al v. Bush, et al. Civil Action No. 1:06-cv-00313-GEL

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Al-Haramain v. Bush, No. 06-274 (D. Or.).

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Mark E. Guzzi v. President George Bush, et al

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