## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

LARRY E. KLAYMAN, CHARLES STRANGE, and MARY ANNE STRANGE, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

BARACK HUSSEIN OBAMA, ERIC HIMPTON HOLDER, JR., KEITH B. ALEXANDER, LOWELL C. MCADAM, ROGER VINSON, VERIZON COMMUNICATIONS, NATIONAL SECURITY AGENCY, and U.S. DEPARTMENT OF JUSTICE, Defendants. No. 1:13-cv-00851-RJL

## STIPULATION OF DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(ii), all parties that have appeared in

this action jointly stipulate to the voluntary dismissal without prejudice of any and all claims by

Plaintiffs against Defendants Verizon Communications Inc. and Lowell C. McAdam. All parties

shall bear their own costs.

/s/ Larry Klayman (as authorized) Larry Klayman, Esq. (D.C. Bar No. 334581) Freedom Watch, Inc. 2020 Pennsylvania Ave. NW, Suite 800 Washington, DC 20006 Tel: (310) 595-0800 leklayman@gmail.com

Counsel for Plaintiffs

Respectfully submitted,

/s/ Brian M. Boynton Randolph D. Moss (D.C. Bar No. 417749) Brian M. Boynton (D.C. Bar. No. 483187) WILMER CUTLER PICKERING HALE AND DORR LLP 1875 Pennsylvania Avenue, NW Washington, DC 20006 Tel.: (202) 663-6000 Fax: (202) 663-6363 randolph.moss@wilmerhale.com

Counsel for the Verizon Defendants

Stuart F. Delery Assistant Attorney General

Joseph H. Hunt Director, Federal Programs Branch

Anthony J. Coppolino Deputy Branch Director

/s/ James J. Gilligan (as authorized)

James J. Gilligan Special Litigation Counsel

Marcia Berman Senior Trial Counsel

Bryan Dearinger Rodney Patton Trial Attorneys U.S. Department of Justice Civil Division, Federal Programs Branch 20 Massachusetts Ave., N.W., Room 6102 Washington, D.C. 20001 Phone: (202) 514-2205 Fax: (202) 616-8470

Counsel for the Government Defendants

## **CERTIFICATE OF SERVICE**

I hereby certify that on January 31, 2014, I filed the foregoing document with the Clerk of Court for the United States District Court for the District of Columbia using the Court's CM/ECF system, which caused notice of the filing to be served upon all counsel of record.

> /s/ Brian M. Boynton Brian M. Boynton