

review of all documents that were filed in both the FISC and FISCR, Yahoo requests that this Court lift its stay and issue an order directing the Government to provide the Court with a status report regarding the status of its declassification review and a scheduling order to complete the declassification review.

Counsel for Yahoo has conferred with the government, which takes no position on this motion.

Dated: October 24, 2014

Signature: /s/Jacob A. Sommer

Jacob A. Sommer
Marc J. Zwillinger
ZwillGen PLLC
1900 M St NW, Suite 250
Washington, DC 20036
jake@zwillgen.com
marc@zwillgen.com

Attorneys for Yahoo! Inc.

CERTIFICATE OF SERVICE

I hereby certify that on October 24, 2014, I served copies of the foregoing motion on:

Carli Rodriguez-Feo
United States Department of Justice
Litigation Security Group
2 Constitution Square
145 N St NE
Suite 2W-115
Washington, D.C. 20530
(202) 514-9016
Carli.Rodriguez-Feo@usdoj.gov

pursuant to FISC Rule 8 and procedures established by the Security and Emergency Planning Staff, United States Department of Justice.

I also hereby certify that I served a true copy of the foregoing motion on the United States via electronic delivery and by U.S. mail on October 24, 2014 addressed to:

Jonathan Fischbach
United States Department of Justice
National Security Division
950 Pennsylvania Ave N.W.
Washington, D.C. 20530

/s/ Jacob A. Sommer

Jacob A. Sommer