

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN CIVIL LIBERTIES UNION,
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION,

Plaintiffs,

v.

FEDERAL BUREAU OF INVESTIGATION,
UNITED STATES DEPARTMENT OF
JUSTICE,

Defendants.

No. 11 Civ. 07562 (WHP)

MOTION OF BRETT MAX KAUFMAN TO WITHDRAW AS COUNSEL

Pursuant to United States District Court for the Southern District of New York Local Civil Rule 1.4, Brett Max Kaufman, undersigned counsel, moves to withdraw as counsel for Plaintiffs American Civil Liberties Union and the American Civil Liberties Union Foundation in the above-captioned matter. In support of this motion, he shows as follows:

1. He is an attorney for Plaintiffs American Civil Liberties Union and the American Civil Liberties Union Foundation in the above entitled action.
2. He entered his appearance as counsel on May 1, 2014.
3. His term as a legal fellow with the American Civil Liberties Union Foundation's National Security Project has expired, and as of August 25, 2014, he has taken up a new position as a teaching fellow and staff attorney at the Technology Law & Policy Clinic at New York University School of Law.

4. On August 22, 2014, he stopped working for and representing clients as an employee of the American Civil Liberties Union Foundation.
5. Plaintiffs will continue to be represented by ACLU attorneys Jameel Jaffer, Patrick Toomey, and Alex Abdo, and by attorney Charles Sims of the law firm Proskauer Rose LLP. No party will be prejudiced by Kaufman's withdrawal.

/s/ Brett Max Kaufman

Brett Max Kaufman

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Counsel for Plaintiffs

September 4, 2014