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 14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 SAN FRANCISCO DIVISION

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IN RE:
 NATIONAL SECURITY AGENCY
 TELECOMMUNICATIONS
 RECORDS LITIGATION

This Document Relates To:
 No. 06-220 (D.R.I.)
 No. 1:06-cv-632 (E.D. Cal.)
 No. cv-06-77 (D. Mont.)
 No. 06-2491 (D. La.)
 No. cv-06-694 (D. Ore.)
 No. 1:06-cv-2680 (N.D. Ill.)
 No. 06-224 (D.R.I.)
 No. 3:06-cv-3574 (N.D. Cal.)
 No. 3:06-cv-4221 (N.D. Cal.)

MDL NO. 06-1791 VRW

**VERIZON'S NOTICE OF MOTION AND
 MOTION TO DISMISS FOR LACK OF
 PERSONAL JURISDICTION AND
 SUPPORTING MEMORANDUM**

[Fed. R. Civ. P. 12(b)(2)]

Hearing Date: June 21, 2007
 Time: 2:00 p.m.
 Courtroom: 6 (17th floor)
 Judge: Hon. Vaughn R. Walker

NOTICE OF MOTION AND MOTION TO DISMISS

TO PLAINTIFFS AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on June 21, 2007, at 2:00 p.m., in the United States District Court for the Northern District of California, San Francisco Division, located at 450 Golden Gate Avenue, San Francisco, California, in Courtroom 6 (17th floor), the following Motion To Dismiss for Lack of Personal Jurisdiction filed by Defendants Verizon Communications Inc., Verizon Global Networks Inc., and MCI, LLC will be heard.

Pursuant to Federal Rule of Civil Procedure 12(b)(2), Defendants Verizon Communications Inc., Verizon Global Networks Inc., and MCI, LLC hereby move to dismiss the complaints filed against them in *Bissitt et al. v. Verizon Communications Inc. et al.*, No. 06-220 (D.R.I.); *Conner et al. v. AT&T, Verizon et al.*, No. 1:06-cv-632 (E.D. Cal.), *Fuller v. Verizon Communications Inc.*, No. cv-06-77 (D. Mont.); *Herron et al. v. Verizon Global Networks Inc. et al.*, No. 06-2491 (D. La.); *Hines v. Verizon Communications Inc.*, No. cv-06-694 (D. Ore.); *Joll et al. v. AT&T Corp., Verizon Communications Inc. et al.*, No. 1:06-cv-2680 (N.D. Ill.); *Mahoney v. Verizon Communications Inc.*, No. 06-224 (D.R.I.); *Riordan et al. v. Verizon Communications Inc.*, No. 3:06-cv-3574 (N.D. Cal.); and *Spielfogel-Landis v. MCI, LLC*, No. 3:06-cv-4221 (N.D. Cal.), on the ground that the courts in which those cases were initially filed lacked personal jurisdiction over them. This motion is based on this notice of motion and motion, the accompanying memorandum of law, the declaration of Joseph P. Dunbar filed herewith, all pleadings and records on file in these cases, and any other arguments and evidence presented to this Court at or before the hearing on this motion.

Defendants Verizon Communications Inc., Verizon Global Networks Inc., and MCI, LLC also join in the Motion To Dismiss Plaintiffs' Master Consolidated Complaint filed concurrently by Verizon Communications Inc., Verizon Northwest Inc., and MCI Communications Services, Inc. For the reasons set forth in that motion, the claims against Verizon Communications Inc., Verizon Global Networks Inc., and MCI, LLC should be dismissed even if this motion to dismiss for lack of personal jurisdiction is denied.

1 Dated: April 30, 2007

Respectfully submitted,

2 WILMER CUTLER PICKERING HALE AND
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3 MUNGER, TOLLES & OLSON LLP

4 Randal S. Milch

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6 By: /s/ John A. Rogovin

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8 Attorneys for Verizon Communications Inc.,
Verizon Global Networks Inc., and MCI, LLC

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