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9
 10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

12
13 IN RE:

14 NATIONAL SECURITY AGENCY
15 TELECOMMUNICATIONS RECORDS
16 LITIGATION

17
18 This Document Relates To:

19 *Bready, et al. v. Verizon Maryland, Inc.*
20 United States District Court for the
21 District of Maryland
Case No. 1:06-2185

MDL Docket No. 06-1791 VRW

Relates to Case No. 3:06-3596
and
Relates to Case No. 3:06-3574

**BREADY PLAINTIFFS’
MOTION FOR
ADMINISTRATIVE RELIEF**

Courtroom: 6, 17th Floor
Judge: Hon. Vaughn R. Walker

[Civ. L.R. 7-11]

1 Pursuant to Civil L.R. 7-11, Plaintiffs **CHRISTOPHER BREADY, et al.**
2 (hereinafter “Plaintiffs”), do hereby move this Court to grant them administrative relief,
3 respectfully requesting that this Court issue an order to show cause as to why the Court’s
4 resolution of the remand motions of *Campbell, et al. v. AT&T Communications of*
5 *California, Inc.*, Case No. 3:06-3596 (N.D. Cal.) (hereinafter “*Campbell*”), and *Riordan,*
6 *et al. v. Verizon Communications, Inc., et al.*, Case No. 3:06-3574 (N.D. Cal.)
7 (hereinafter “*Riordan*”), scheduled for hearing on December 21st, 2006, should not be
8 applied to the remand motion pending in *Bready, et al. v. Verizon Maryland, Inc.*, Case
9 No. 1:06-2185 (D. Md.) (hereinafter “*Bready*”) (*Bready* Dkt. 15).

11 **I. ADMINISTRATIVE RELIEF REQUESTED**

12 Plaintiffs request that the Court issue an order to show cause as to why the
13 Court’s Order regarding the remand motions of *Campbell* and *Riordan* should not apply
14 to the *Bready* remand motion.

16 **II. REASONS ADMINISTRATIVE RELIEF IS SOUGHT**

17 Plaintiffs respectfully state that the administrative relief sought herein will help
18 avoid prejudice to their action, and will further judicial efficiency. The *Bready* action is
19 one of only four actions, including *Campbell, Riordan, and Chuslky, et al. v. Cellco*
20 *Partnership*, No. 06-cv-2530 (D.N.J.), that have been transferred to this Court and have
21 remand motions pending response and or judicial resolution. In early 2007, this Court’s
22 Civil Minute Order, as amended on November 17, 2006, requires that master complaints
23 be filed and served by the plaintiffs; importantly, this Court will also determine whether
24 the United States Government’s request for a stay in the MDL action should be granted.
25 (MDL 1791 Dkt. 78). The Plaintiffs, as Maryland state residents seeking state-law
26

1 remedies against a Maryland corporation, wish to have their jurisdictional issues resolved
2 prior to those events, in order to avoid prejudicial delay to the prosecution of their action,
3 as well as unnecessary costs of participation in federal litigation.

4 Furthermore, the administrative relief sought herein furthers judicial efficiency.
5 Because many of the same issues raised in the *Bready* remand motion could be
6 effectively resolved by this Court on or immediately following the hearing on the 21st of
7 December, only limited supplemental briefing would be required to address the issues of
8 Maryland law, which distinguish the *Bready* action from *Campbell* and *Riordan*, prior to
9 a hearing on this matter.
10

11 III. CONCLUSION

12 For the foregoing reasons, Plaintiffs respectfully request that the administrative
13 relief sought herein be granted, and that this Court issue an Order to Show Cause in
14 writing as to why the *Campbell* and *Riordan* remand Order should not apply to *Bready*.
15

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17 DATED: December 19, 2006

18 /SIGNED/

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