

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

FILED  
2005 JUL -1 A 9 05  
CLERK, US DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY                       
DEPUTY

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IN RE: Request from Requesting State           §  
Pursuant to the Treaty Between the       §  
United States of America and the       §       No. SA-04CA0676-OG  
Requesting State on Mutual           §  
Assistance in Criminal Matters       §       **FILED UNDER SEAL**

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**MOVANTS' REPLY TO GOVERNMENT'S RESPONSE TO THE COURT'S  
ORDER REQUIRING A RESPONSE FROM THE GOVERNMENT**

Movants the Electronic Frontier Foundation, the Urbana-Champaign Independent Media Center Foundation, and Jeffrey Moe hereby respond to the Government's request that the sealed documents in this matter be unsealed as redacted.

Movants respectfully request that this Court, in addition to unsealing the documents specified in the Government's response, also unseal the Government's sealed pleadings regarding Movants' Motion to Unseal and this Court's sealed Orders regarding the same. These would include, but are not necessarily limited to:

- a) This Court's Order regarding Movants' Motion to Unseal, dated December 9, 2004.
- b) Any Government response to this Court's Order of December 9, 2004. Movants are not aware of the specific nature or number of such pleadings.
- c) This Court's Order Consolidating Cases and Requiring Response from the Government, dated May 24, 2005.
- d) The Government's Response to the Court's Order Requiring a Response from the Government, undated.
- e) This pleading.

By this request, Movants do not concede that the redactions and continued seal proposed

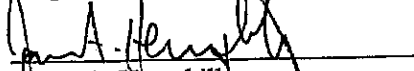
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by the Government are proper, but instead reassert the arguments made in their Motion for the complete unsealing of the record. Therefore, Movants' Proposed Order reflects this position.

Respectfully submitted by,



James A. Hemphill

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was sent by certified mail,  
return receipt requested, to:

Don J. Calvert  
Assistant U.S. Attorney  
U.S. Department of Justice  
Western District of Texas  
601 N.W. Loop 410, Suite 600  
San Antonio, TX 78216

on June 30, 2003

  
James A. Hemphill