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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA

10 RAHINAH IBRAHIM, )  
 )  
11 Plaintiff, )  
 )  
12 v. )  
 )  
13 DEPARTMENT OF HOMELAND )  
SECURITY, et al., )  
14 Defendants. )

No. CV 06-00545 WHA

DECLARATION OF JOHN R. TYLER,  
COUNSEL FOR FEDERAL DEFENDANTS

15 I, John R. Tyler, Senior Trial Counsel, United States Department of Justice, do hereby  
16 declare as follows:

17 1. I am an attorney of record on behalf of the federal defendants in the above-  
18 captioned lawsuit, which include, *inter alia*, the Transportation Security Administration. In  
19 accordance with Local Civil Rule 7-11(a), I contacted counsel of record for the other parties to  
20 this litigation regarding the federal defendants’ motion to file under seal the Security Directives  
21 that implement the security watch lists – known collectively as the “No Fly list” – which are the  
22 subject of plaintiff’s claims against the federal government. I asked counsel whether they were  
23 willing to stipulate to the filing of these Security Directives under seal, explaining that the federal  
24 defendants seek to submit these Security Directives in support of their motion to dismiss  
25 plaintiff’s claims for lack of subject matter jurisdiction, which is to be filed with the Court on  
26 May 22, 2006, for hearing on Thursday, June 29, 2006.

27 Declaration of John R. Tyler  
28 No. CV 06-0545 WHA

