

1 STUART F. DELERY
Assistant Attorney General

2 MELINDA L. HAAG
3 United States Attorney

4 DIANE KELLEHER
5 Assistant Branch Director

6 PAUL G. FREEBORNE
Senior Trial Counsel
7 KAREN S. BLOOM
LILY S. FAREL
8 JOHN K. THEIS
Trial Attorneys
9 Civil Division, Federal Programs Branch
U.S. Department of Justice
10 P.O. Box 883
Washington, D.C. 20044
11 Telephone: (202) 353-0543
Facsimile: (202) 616-8460
12 E-mail: paul.freeborne@usdoj.gov

13 *Attorneys for Defendants*

14
15 **UNITED STATES DISTRICT COURT**
FOR THE NORTHERN DISTRICT OF CALIFORNIA
16

17 RAHINAH IBRAHIM,

18
19 Plaintiff,

20 v.

21 DEPARTMENT OF HOMELAND
22 SECURITY, *et al.*,

23 Defendants.
24

No. 3:06-cv-0545 (WHA)

DEFENDANTS' NOTICE OF FILING
CLASSIFIED PROPOSED FINDINGS OF
FACT AND CONCLUSIONS OF LAW IN
CAMERA, EX PARTE

1 Pursuant to the Court's December 5, 2013 Order (Dkt. 652), Defendants have lodged
2 their proposed findings of fact and conclusions of law based on the classified evidence excluded
3 under this Court's ruling on the state secrets privilege for the Court's *in camera, ex parte* review.
4 These proposed findings of fact and conclusions of law are accompanied by declarations, as
5 contemplated by the Court's December 5, 2013 Order.

6
7 Dated: December 13, 2013

Respectfully submitted,

8 STUART F. DELERY
9 Assistant Attorney General

10 DIANE KELLEHER
Assistant Branch Director

11 /s/ Paul G. Freeborne
12 PAUL G. FREEBORNE
Senior Trial Counsel
13 KAREN S. BLOOM
LILY S. FAREL
14 JOHN K. THEIS
Trial Attorneys
15 United States Department of Justice
Civil Division

16
17 *Attorneys for the Defendants*
18
19
20
21
22
23
24
25
26
27
28