**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

KEVIN POULSEN
520 Third Street, Suite 305
San Francisco, CA 94107,

                    Plaintiff,

    vs.

DEPARTMENT OF HOMELAND SECURITY
Washington, DC 20528,

                    Defendant,

    and

MASSACHUSETTS INSTITUTE OF
TECHNOLOGY
77 Massachusetts Avenue
Cambridge, MA 02139,

                Intervenor-Defendant.

Case No. 13-0498 (CKK)

CONSENT MOTION FOR AN EXPEDITED HEARING

Movant-Intervenor Massachusetts Institute of Technology ("MIT"), by its undersigned

counsel, hereby respectfully moves that the Court schedule a hearing on MIT's Motion To

Intervene as Defendant and To Establish a Process for Review and Release of Documents for a

date on or before Thursday, July 25, 2013. In support of this motion, MIT states as follows:

    1. On July 5, 2013, this Court ordered that Defendant Department of Homeland Security

("DHS") "promptly release to Plaintiff all responsive documents that it has gathered thus far and

shall continue to produce additional responsive documents that it locates on a rolling basis."

    2. On July 18, 2013, the Massachusetts Institute of Technology filed its Motion to

Intervene as Defendant and to Establish a Process for Review and Release of Documents

("MIT's Motion").

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3. MIT seeks intervention in this FOIA case because it has reason to believe that information in documents responsive to Plaintiff's request would, if released without appropriate redactions, jeopardize the safety of members of the MIT community and the security of its computer networks.

4. MIT's Motion therefore requests that this Court enter an Order establishing a reasonable, expeditious process by which MIT would have the opportunity to review documents to be released by DHS prior to their release to Plaintiff, so that MIT may propose redactions to those documents in order to protect the safety of members of the MIT community and the security of MIT's computer networks.

5. Counsel for MIT has conferred with counsel for Plaintiff regarding this request for an expedited hearing. Plaintiff's counsel has stated that Plaintiff consents to this request for an expedited hearing. Plaintiff's counsel has further stated that Plaintiff also consents to the government postponing the commencement of its rolling production of documents until the Court conducts such expedited hearing, provided that such a hearing occurs on or before July 25, 2013. (Counsel for Plaintiff further stated that he will not be available between July 29 and August 7, 2013.)

6. Counsel for MIT has also conferred with counsel for Defendant regarding this request for an expedited hearing. Counsel for Defendant has stated that Defendant consents to this request, contingent upon Plaintiff's consent as stated herein.

7. On July 18, 2013, after counsel for MIT notified the Court of its intent to file the instant motions, this Court entered an Order staying the obligation of the Defendant to promptly release to Plaintiff all responsive documents that it has located on a rolling basis, as provided in its July 5, 2013 Order, until further order of the Court.

8. Conducting an expedited hearing on MIT's Motion on or before July 25, 2013 will promote the orderly and expeditious resolution of this matter in a manner that permits Movant-Intervenor's significant interests to be taken into account while at the same time avoiding a situation in which Defendant commences its rolling disclosure of requested documents to Plaintiff before the Court is able to consider those interests.

Therefore, for all of the foregoing reasons, MIT respectfully requests that the Court hold an expedited hearing on or before July 25, 2013, to consider MIT's Motion to Intervene and Establish a Process For Review and Release of Documents.

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By: _/s/ Patrick J. Carome____
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Dated: July 18, 2013