
**IN THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Federal Cases

United States v. Place

United States v. Saboonchi

United States v. Taketa

United States v. U.S. Dist. Ct. Keith"

United States v. Verdugo-Urquidez

Constitutional Provisions

passim

Other Authorities

On the Bulk Collection of Tangible Things

Quick Guide to Cell Phone Carriers

Report on the Telephone Records Program Conducted under Section 215 of the USA PATRIOT Act and on the Operations of the Foreign Intelligence Surveillance Court

passim

Encryption and Globalization

Liberty and Security in a Changing World *passim*

Strengthening Privacy Rights and National Security: Hearing Before the S. Comm. on the Judiciary

Fact Sheet: The Administration's Proposal for Ending the Section 215 Bulk Telephony Metadata Program

INTRODUCTION

Smith v. Maryland

Smith

See

Id.

Smith

Knotts

United States v. Nerber *does*

Knotts

United States v. Nerber

United States v. Garcia

vacated on other grounds

Riley

Riley

Riley

see also

See

see

See *Rakas* *v.* *Illinois*

Id. *one type*

Id.

B. The Call-Records Program Is Unconstitutional Because It Is Unreasonable.

see also Klayman v. Obama

efficient

impracticable

See

Cotterman

see also United States v. Crist

United States v. Saboonchi

See, e.g. United States v. Taketa

King

Klayman *not*

Berger v. New York

II. MRS. SMITH HAS STANDING TO CHALLENGE THE CALL-RECORDS PROGRAM

Jewel v. NSA

Jewel

---

see

See, e.g.

Klayman

Klayman

Illinois v. Caballes

see also United States v. Young

See,

CERTIFICATE OF SERVICE