

**BETWEEN:**

**PRIVACY INTERNATIONAL**

**Claimants**

**-and-**

**(1) SECRETARY OF STATE FOR FOREIGN AND COMMONWEALTH AFFAIRS**

**(2) GOVERNMENT COMMUNICATION HEADQUARTERS**

**Defendants**

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**WITNESS STATEMENT OF CINDY COHN**

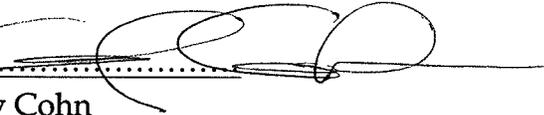
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I, Cindy Cohn, Legal Director of Electronic Frontier Foundation, 815 Eddy Street, San Francisco, California 92109, US, SAY AS FOLLOWS:

1. I write in support of Privacy International's claim in this matter. I rely on an early statement that was written by me in support of the Applicants in the matter Big Brother Watch, Open Rights Group, English PEN and Dr Constanze Kurz v United Kingdom, Application No: 58170/13 ("BBW application") in the European Court of Human Rights and the exhibits referred to therein. Documents referred to in this statement are exhibited marked "CC/1."
2. The BBW statement was made on 27 September 2013, and its contents remain true to the best of my knowledge and belief. Since that time there have been further disclosures and development but these do not impact upon the relevance or veracity of my previous statement.

**STATEMENT OF TRUTH**

I believe that the facts stated in this witness statement are true.

SIGNED:   
Cindy Cohn

DATED: 6 5 June 2014