

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

	X	
<b>KEVIN POULSEN</b>	:	
520 Third Street, Suite 305	:	
San Francisco, CA 94107	:	
	:	
Plaintiff,	:	
	:	
	:	Case No. 13-cv-00498 (CKK)
	:	
v.	:	
	:	
<b>DEPARTMENT OF HOMELAND SECURITY</b>	:	
Washington, DC 20258	:	
	:	
Defendant.	:	
	X	

**JSTOR’S MOTION TO INTERVENE**

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 24, non-party Ithaca Harbors, Inc., the not for profit organization that operates the JSTOR digital library (“JSTOR”), hereby respectfully moves this Court to intervene in this case. Counsel for Plaintiff has represented that Plaintiff presently takes no position with respect to JSTOR’s motion but, upon review of the motion, reserves the right to file an appropriate response within the time provided by the Court’s rules. Defendant has advised that it consents to JSTOR’s intervention. Neither Plaintiff nor Defendant has stated any position with respect to the relief sought by JSTOR.

[remainder of page intentionally left blank]

The grounds supporting intervention are further set forth in the accompanying Memorandum of Points and Authorities and the Declaration of Kevin Guthrie. Pursuant to Local Civil Rule 7(j), JSTOR's Proposed Answer to the Complaint filed in this case is attached to this motion as Exhibit 1, and a Rule 7.1 Disclosure is attached as Exhibit 2.

Dated: July 19, 2013

Respectfully submitted,

/s/ Timothy K. Beeken

By: Timothy K. Beeken [Member of  
D.D.C., not of D.C. Bar]

Bruce E. Yannett [D.C. Bar # 416306]

Of Counsel:

Jeremy Feigelson  
Jared I. Kagan  
DEBEVOISE & PLIMPTON LLP  
919 Third Avenue  
New York, New York 10022  
(212) 909-6000  
jfeigels@debevoise.com  
jikagan@debevoise.com

DEBEVOISE & PLIMPTON LLP  
919 Third Avenue  
New York, New York 10022  
(212) 909-6000  
tkbeeken@debevoise.com  
beyannett@debevoise.com

*Counsel for Non-Party Ithaca Harbors,  
Inc. d/b/a/ JSTOR*