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13			
	Attorneys for DEFENDANTS		
14	UNITED STATES DISTRICT COURT		
15	NORTHERN DISTRICT OF CALIFORNIA		
16	OAKLAND DIVISION		
17	VIETNAM VETEDANC OF AMEDICA -4 -1	Coss No. CV 00 0027 CW	
18	VIETNAM VETERANS OF AMERICA, et al.,	Case No. CV 09-0037-CW	
19	Plaintiffs,		
20	V.	DECLARATION OF KIMBERLY L. HERB IN SUPPORT OF	
	CENTRAL INTELLIGENCE AGENCY, et al.,	DEFENDANTS' OPPOSITION TO	
21	Defendants.	PLAINTIFFS' MOTION TO COMPEL	
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24			
25	I, Kimberly L. Herb, declare as follows:		
26	1. I am a Trial Attorney in the Federal Programs Branch, Civil Division of the United States		
27	Department of Justice. I represent Defendants in this case. This declaration is based on		
28	Department of Justice. Trepresent Defenda	ins in this case. This declaration is based on	
۷۵	NO. C 09-37 CW	1	
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1		my personal knowledge and based upon my review of documents provided to me in my	
2		official capacity as counsel in this litigation.	
3	2.	Attached hereto as Exhibit A is a true and accurate copy of a document Defendants	
4		produced to Plaintiffs, a portion of the Central Intelligence Agency's ("CIA") historic	
5		record retirement request form ("manifest"), which is Bates labeled VET019-000039-43.	
6	3.	Attached hereto as Exhibit B is a true and accurate copy of an excerpt of the discovery	
7		dispute hearing held before Magistrate Judge Corley on April 5, 2012.	
8	4.	Attached hereto as Exhibit C is a true and accurate copy of a May 3, 2012 letter from	
9		Gordon Erspamer, counsel for Plaintiffs, to me.	
10	5.	Attached hereto as Exhibit D is a true and accurate copy of excerpts of the Rule 30(b)(6)	
11		deposition of Patricia Cameresi, Information Review Officer at the CIA, on November 9,	
12		2011.	
13			
14		I declare under penalty of perjury that the foregoing is true and correct. Executed in	
15	Washington, D.C. on June 6, 2012.		
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17		<u>/s/ Kimberly L. Herb</u> Kimberly L. Herb	
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