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3 **UNITED STATES DISTRICT COURT**
4 **NORTHERN DISTRICT OF CALIFORNIA**

5 VIETNAM VETERANS OF AMERICA et al.,

No.: CV 09-0037-CW

6 Plaintiffs,

DECLARATION OF
MATTHEW J. SCHOFIELD,

7 v.

8 CENTRAL INTELLIGENCE AGENCY, et
9 al.,

10 Defendants

11 Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

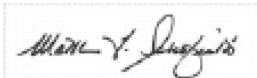
- 12 1. I am the Program Manager, Medical Care Injunction for Participants of Chemical or
- 13 Biological Substance Testing Programs, Army Public Health Center (APHC), U.S.
- 14 Army Medical Command (MEDCOM), and the MEDCOM Field Operating Agency
- 15 with responsibility for supporting the U. S. Army in relation to this litigation. I am
- 16 familiar with this litigation based upon information received from my staff and legal
- 17 advisors within MEDCOM.
- 18
- 19 2. As of June 14, 2019, the Army has received 166 applications, 111 of which were
- 20 deemed complete and reviewed by a Benefits Application Panel (BAP). The BAP
- 21 recommended approval for medical care for 71 of the applications for some or all of the
- 22 conditions listed on the application, and recommended against approval for medical
- 23 care (all conditions) in 40 cases.
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- 25 3. As of June 14, 2019, the remaining 55 applications are either in progress (Army has
- 26 requested (16), or is in process of requesting (23) additional information for
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incomplete applications (39); or the application was closed due to veteran declining further participation or the death of the applicant (16 applications).

- 4. As of June 14, 2019, of the 71 applications recommended for SECDES approval by the BAP, 70 applications have received SECDES approval for all or some of the diagnosed conditions, and one applications is pending SECDES Program approval.

I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct. Executed on June 17, 2019.



MATTHEW J. SCHOFIELD, PH.D.
COLONEL, U.S. ARMY