

Exhibit B, Declaration of Paul Weiss

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11 Attorneys for DEFENDANTS

12 UNITED STATES DISTRICT COURT  
 13 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

14 VIETNAM VETERANS OF AMERICA,	)	
15 <i>et al,</i>	)	
	)	Civil Action No. C 09-0037 CW
16 Plaintiffs,	)	
	)	DECLARATION OF
17 v.	)	PAUL WEISS
	)	
18 CENTRAL INTELLIGENCE AGENCY,	)	
19 <i>et al,</i>	)	
	)	
20 Defendants.	)	
	)	

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22 I, Paul Weiss, hereby declare as follows:

23 1. I am a Supervisory Claims Manager/Privacy Officer in the Department of Veterans  
24 Affairs, VA Regional Office, New York, New York ("New York VA Regional Office"). In this  
25 capacity, I am familiar with how the records of the New York VA Regional Office are kept and  
26 maintained.

27 2. This declaration is based on my personal knowledge of the New York VA Regional  
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1 Office's recordkeeping policies and procedures as well as on the records of that office.

2 3. The pages attached hereto are true and accurate copies of excerpts of the New York  
3 VA Regional Office's Claims File of David C. Dufrane. The Claims File of David C. Dufrane is  
4 maintained in the Claims File System, which is kept and maintained in the New York VA Regional  
5 Office's course of regularly conducted business activity.

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7 I declare under penalty of perjury that the foregoing is true and correct. Executed in New  
8 York, New York on June 26, 2009.

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12 PAUL WEISS  
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