

EXHIBIT B



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July 30, 2010

Via Email

Mr. Daniel Vecchio, Esq.
Morrison & Foerster, LLP
425 Market Street
San Francisco, CA 94105-2482

RE: *Vietnam Veterans of America, et al. v. CIA, et al.*, No. CV 09 0037-CW (N.D. Cal.)

Dear Mr. Vecchio:

I write regarding the protective order covering third-party information that you have proposed. We believe that we will be able to agree to a stipulated proposed order and are currently in the process of working with our clients to craft language that both protects the interests of third parties and facilitates discovery.

Before we can send you proposed changes to your draft, however, we need additional information from you. On June 30, after Mr. Erspamer left the meet-and-confer session, we revisited the protective order issue with you and explained Defendants' concerns about individual test participants being contacted. You indicated that you would let us know how Plaintiffs propose that any organizational plaintiff representatives would use the information identifying participants if given access. We have not received that information and request that you send it as soon as possible.

We hope to send you a response to your proposed protective order soon after we receive this information regarding the organizational plaintiffs. Please understand that while we believe that we will be able to stipulate to a proposed protective order, any final order to be proposed to the Court will have to be approved by the appropriate officials in our office and our client agencies.

Sincerely,

/s/

Lily Farel