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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

VIETNAM VETERANS OF AMERICA, *et al.*,

Plaintiffs,

v.

CENTRAL INTELLIGENCE AGENCY, *et al.*,

Defendants.

Case No. CV 09-0037-CW

DECLARATION OF PATSY A.  
D'ERAMO, JR., U.S. ARMY  
EDGEWOOD CHEMICAL  
BIOLOGICAL CENTER

I, Patsy A. D'Eramo, Jr., am familiar with the complaint in this case and declare the following under penalty of perjury:

1. I am a Technical Information Specialist assigned to the Edgewood Chemical Biological Center (ECBC) Technical Library at the Edgewood Area of Aberdeen Proving Ground. ECBC is the Army's principal research and development center for non-medical chemical and biological defense, focusing on chemical and biological agent detection, protection, and decontamination. ECBC traces its history through several organizational and name changes to the original Technical Division of the Chemical Warfare Service (CWS), the Chemical and Radiological Laboratories (C&RL), the Chemical Warfare Laboratories (CWL), and the Chemical Research and Development Laboratories (CRDL). The ECBC Technical Library maintains both digital and physical documents. Both are indexed and retrievable via the ECBC Technical Library online catalog STILAS. The document collection reflects the mission of ECBC and includes documents related to technical aspects of chemical and biological agent detection, protection, and decontamination. Included in the collection are the documents published by ECBC and its predecessor organizations, Division 9 and 10 documents published by the Office of Scientific and Research Development during World War II, duplicative documents from Dugway Proving Ground and Fort Detrick and their predecessors, and foreign reports. There are over 75000 unique document records in STILAS, including both classified

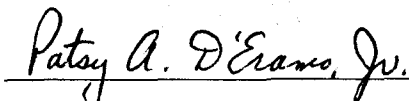
1 and unclassified documents. These documents are related to the technical aspects of chemical  
2 and biological defense.

3 2. As a Technical Information Specialist I am involved in the search for documents  
4 responsive to plaintiffs' discovery requests in this case. I have searched and will continue to  
5 search for documents referenced in the requests for production.

6 3. As part of this search the Technical Library has searched for documents in our  
7 possession that correspond to the chapter footnotes and bibliography from the 1976 Department  
8 of the Army Inspector General's Investigation Report DAIG-IN-21-75, "Use of Volunteers in  
9 Chemical Agent Research" prepared by James R. Taylor and William N. Johnson, 10 March  
10 1976. To date 25 documents have been identified in the chapter footnotes of the 1976 Army  
11 Inspector General Report and 220 documents have been identified in the bibliography. An  
12 additional 8 documents have been identified that are not owned by the ECBC Technical Library  
13 in the Defense Technical Information Center (DTIC). Numerous search techniques were used to  
14 identify the documents. I searched by title, corporate author, contract number, report number,  
15 author, report date, subject, etc. in both STILAS and DTIC. If any positive citations resulted I  
16 reviewed the records to identify how the records were indexed and whether any other fields of  
17 information might allow for further searching.

18 4. To date, a total of 110 hours have been spent on this litigation.

19 I hereby declare under penalty of perjury that the foregoing is true and correct. Executed  
20 this 15th day of September, 2010.

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24 Patsy A. D'Eramo, Jr.

25 Edgewood Chemical Biological Center  
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