

1 GORDON P. ERSPAMER (CA SBN 83364)  
 Gerspamer@mofo.com  
 2 EUGENE ILLOVSKY (CA SBN 117892)  
 EIllovsky@mofo.com  
 3 STACEY M. SPRENKEL (CA SBN 241689)  
 SSprenkel@mofo.com  
 4 MORRISON & FOERSTER LLP  
 425 Market Street  
 5 San Francisco, California 94105-2482  
 Telephone: 415.268.7000  
 6 Facsimile: 415.268.7522

7 Attorneys for Plaintiffs  
 Vietnam Veterans of America; Swords to  
 8 Plowshares; Veterans Rights Organization;  
 Bruce Price; Franklin D. Rochelle; Larry  
 9 Meirow; Eric P. Muth; David C. Dufrane;  
 Wray C. Forrest; Tim Michael Josephs; and  
 10 William Blazinski

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

14 VIETNAM VETERANS OF AMERICA *et al.*,  
 15 Plaintiffs,  
 16 v.  
 17 CENTRAL INTELLIGENCE AGENCY *et al.*,  
 18 Defendants.

Case No. CV 09-0037-CW

**DECLARATION OF  
 STACEY M. SPRENKEL IN SUPPORT  
 OF PLAINTIFFS' MOTION FOR CLASS  
 CERTIFICATION WITH EXHIBITS**

**[AMENDED VERSION PURSUANT TO  
 FEBRUARY 24, 2012 ORDER]**

Hearing Date: April 5, 2012  
 Time: 2:00 pm.  
 Courtroom: 2, 4th Floor  
 Judge: Hon. Claudia Wilken

Complaint filed January 7, 2009

**EXHIBITS 3, 12, 14 & 65 REDACTED**

**EXHIBITS 69, 70, 71, 72 & 73  
 FILED UNDER SEAL**

**PUBLIC REDACTED VERSION**

1 I, STACEY M. SPRENKEL, declare as follows:

2 1. I am an attorney licensed to practice law in the State of California and am admitted  
3 to practice before this Court. I am an associate with the law firm of Morrison & Foerster LLP,  
4 counsel of record for Vietnam Veterans of America, Swords to Plowshares: Veterans Rights  
5 Organization, Bruce Price, Franklin D. Rochelle, Larry Meirow, Eric P. Muth, David C. Dufrane,  
6 Wray C. Forrest, Tim Michael Josephs, and William Blazinski (“Plaintiffs”) in this action. I  
7 submit this Declaration in Support of Plaintiffs’ Motion for Class Certification. I make this  
8 Declaration based on personal knowledge and discussions with support staff working under my  
9 direction. If called as a witness, I would testify to the facts set forth below.

10 2. This Declaration incorporates instructions from the Court’s February 24, 2012  
11 Order Granting in Part, and Denying in Part, Plaintiffs’ Motion to File Under Seal (Docket No.  
12 352)and now reflects that the public version of the document attached hereto as Exhibit 3 contains  
13 redactions. Separately, this Declaration also now reflects that the document attached hereto as  
14 Exhibit 65 contains redactions. This Declaration is intended to replace the declaration lodged  
15 with the Court on February 10, 2012.

16 3. Attached hereto as Exhibit 1 is a true and correct copy of what I am informed and  
17 believe is a document entitled, “Chemical Warfare Agent Experiments Among U.S. Service  
18 Members,” produced by Defendants at Bates labels VET001\_015675 through VET001\_015707  
19 and Deposition Exhibit No. 554 in this case.

20 4. Attached hereto as Exhibit 2 is a true and correct copy of what I am informed and  
21 believe is a string of emails, produced by Defendants at Bates labels VET140\_001609 through  
22 VET140\_001610 and Deposition Exhibit No. 774 in this case.

23 5. Attached hereto as Exhibit 3 is a redacted true and correct copy of what I am  
24 informed and believe is a string of emails and attachments, produced by Defendants at Bates  
25 labels VET125\_047490 through VET125\_0047505 and Deposition Exhibit No. 807 in this case.

26 6. Attached hereto as Exhibit 4 is a true and correct copy of what I am informed and  
27 believe is an excerpt of a document entitled, “Department of Defense Office of the Under  
28 Secretary of Defense Personnel & Readiness Chemical Weapons Exposure Project Summary for

1 1993,” prepared by Martha E. Hamed, produced by Defendants beginning at Bates labels  
2 VET017-000001, and is also an excerpt of Deposition Exhibit No. 467 (Parts 1 and 2) in this  
3 case.

4 7. Attached hereto as Exhibit 5 are true and correct copies of what I am informed and  
5 believe are U.S. War Department documents from 1937 concerning testing on human subjects,  
6 produced by Defendants with Bates labels VET110-000003 through VET110-000007.

7 8. Attached hereto as Exhibit 6 is a true and correct copy of what I am informed and  
8 believe is a document entitled, “U.S. Army Activity in the U.S. Biological Warfare Programs,  
9 Volume I,” dated February 24, 1977, which is an excerpt from Congressional Hearings on  
10 “Biological Testing Involving Human Subjects by the Department of Defense” held on March 8  
11 and May 22, 1977, and is an excerpt of Deposition Exhibit 320 in this case.

12 9. Attached hereto as Exhibit 7 is a true and correct copy of what I am informed and  
13 believe is a document entitled, “The Edgewood Arsenal Database [Also Known as the Chemical,  
14 Biological, Radiological, Nuclear, Explosive (CBRNE) Database],” produced by Defendants at  
15 Bates labels VET007\_0011419 through VET007\_0011420 and Deposition Exhibit No. 288 in this  
16 case.

17 10. Attached hereto as Exhibit 8 is a true and correct copy of what I am informed and  
18 believe is a document entitled, “VBA Outreach Efforts to Veterans Exposed to Chemical and  
19 Biological Substances at Edgewood Arsenal,” produced by Defendants at Bates labels DVA003  
20 021519 through DVA003 021520 and Deposition Exhibit No. 805 in this case.

21 11. Attached hereto as Exhibit 9 is a true and correct copy of what I am informed and  
22 believe is a document entitled, “Chemical Compounds Used in Human Testing at Edgewood  
23 Arsenal (1955 to 1975),” produced by Defendants at Bates labels VET001\_011697 through  
24 VET001\_011698 and Deposition Exhibit No. 104 in this case.

25 12. Attached hereto as Exhibit 10 is a true and correct copy of excerpts from the  
26 transcript of the July 7, 2011 deposition of Martha Hamed.

27 13. Attached hereto as Exhibit 11 is a true and correct copy of excerpts from the  
28 transcript of the June 3, 2011 deposition of William Blazinski.

1           14.     Attached hereto as Exhibit 12 is a redacted true and correct copy of excerpts from  
2 the transcript of the June 1, 2011 deposition of Tim Michael Josephs.

3           15.     Attached hereto as Exhibit 13 is a true and correct copy of what I am informed and  
4 believe is a draft report, produced by Defendants with Bates labels VET123-002581 through  
5 VET123-002617 and Deposition Exhibit No. 737 in this case.

6           16.     Attached hereto as Exhibit 14 is a redacted true and correct copy of what I am  
7 informed and believe is a letter from John Josselson to Colonel McClure, dated August 8, 1975,  
8 and produced by Defendants at Bates labels DVA035 001169 through DVA035 001170.

9           17.     Attached hereto as Exhibit 15 is a true and correct copy of what I am informed and  
10 believe is an excerpt from the Joint Hearings before the Subcommittee on Health of the  
11 Committee on Labor and Public Welfare and the Subcommittee on Administrative Practice and  
12 Procedure of the Committee on the Judiciary, United States Senate, held on September 10 and 12  
13 and November 7, 1975, and Deposition Exhibit No. 319 in this case.

14           18.     Attached hereto as Exhibit 16 is a true and correct copy of what I am informed and  
15 believe is a memorandum from Army General Counsel Jill Wine-Volner with the subject,  
16 “Notification of Participants in Drug or Chemical/Biological Agent Research,” dated August 8,  
17 1979, produced by Defendants at Bates labels VET123\_004994 through VET123\_004995 and  
18 Deposition Exhibit No. 710 in this case.

19           19.     Attached hereto as Exhibit 17 is a true and correct copy of what I am informed and  
20 believe is a memorandum from Army General Counsel Jill Wine-Volner with the subject,  
21 “Notification of Participants in Drug or Chemical/Biological Agent Research,” dated September  
22 24, 1979, produced by Defendants at Bates labels VET017-000279 through VET017-000280 and  
23 Deposition Exhibit No. 310 in this case.

24           20.     Attached hereto as Exhibit 18 is a true and correct copy of what I am informed and  
25 believe is a memorandum from Army Chief of Staff John McGiffert with the subject,  
26 “Notification of Participants in Drug or Chemical/Biological Agent Research,” dated October 25,  
27 1979, produced by Defendants at Bates labels VET030-022686 through VET030-022691 and  
28 Deposition Exhibit No. 465 in this case.

1           21. Attached hereto as Exhibit 19 is a true and correct copy of what I am informed and  
2 believe is a memorandum with the subject, "Notification of Participants in Drug or  
3 Chemical/Biological Agent Research," dated November 2, 1979, produced by Defendants at  
4 Bates labels VET030-022692 through VET030-022696 and Deposition Exhibit No. 318 in this  
5 case.

6           22. Attached hereto as Exhibit 20 is a true and correct copy of what I am informed and  
7 believe is a memorandum with the subject, "Chemical Weapons Research Programs Using  
8 Human Test Subjects," dated March 9, 1993 and signed by Secretary of Defense William Perry,  
9 produced by Defendants at Bates labels VET001\_011181 through VET001\_011182 and  
10 Deposition Exhibit No. 235 in this case.

11           23. Attached hereto as Exhibit 21 is a true and correct copy of excerpts from the  
12 transcript of the January 11, 2012 deposition of Norma St. Claire.

13           24. Attached hereto as Exhibit 22 is a true and correct copy of what I am informed and  
14 believe is VHA Directive 2009-047, Provision of Health Care Services to Veterans Involved in  
15 Project 112-Shipboard Hazard and Defense (SHAD) Testing, dated September 30, 2009.

16           25. Attached hereto as Exhibit 23 is a true and correct copy of excerpts from the  
17 transcript of the January 20, 2012 deposition of Mark Brown.

18           26. Attached hereto as Exhibit 24 is a true and correct copy of excerpts from the  
19 transcripts of the January 24-5, 2012 deposition of David Abbot.

20           27. Attached hereto as Exhibit 25 is a true and correct copy of what I am informed and  
21 believe is a document prepared by Brian Pegram, Senior Defense Analyst, U.S. Government  
22 Accountability Office, Defense Capabilities and Management Team, produced by Defendants at  
23 Bates labels DVA003 000299 through DVA003 000301 and Deposition Exhibit No. 281 in this  
24 case.

25           28. Attached hereto as Exhibit 26 is a true and correct copy of what I am informed and  
26 believe is a memorandum with the subject, "Use of Human Volunteers in Experimental  
27 Research," dated February 26, 1953 and signed by C. E. Wilson, with Bates labels C001 through  
28 C003 and Deposition Exhibit No. 95 in this case.

1           29.     Attached hereto as Exhibit 27 is a true and correct copy of what I am informed and  
2 believe is a memorandum with the subject “Use of Volunteers of Research,” dated June 30, 1953,  
3 sent by Chief of Staff John C. Oakes, produced by Defendants at Bates labels VVA 024538  
4 through VVA 024549 and Deposition Exhibit No. 96 in this case.

5           30.     Attached hereto as Exhibit 28 is a true and correct copy of what I am informed and  
6 believe is Army Regulation AR 70-25 “Use of Volunteers as Subjects of Research,” dated March  
7 26, 1962, and Deposition Exhibit No. 94 in this case.

8           31.     Attached hereto as Exhibit 29 is a true and correct copy of what I am informed and  
9 believe is Army Regulation AR 70-25 “Use of Volunteers as Subjects in Research,” dated  
10 January 25, 1990 and Deposition Exhibit No. 311 in this case.

11          32.     Attached hereto as Exhibit 30 is a true and correct copy of what I am informed and  
12 believe is Department of Defense Directive 3216.02, “Protection of Human Subjects and  
13 Adherence to Ethical Standards in DoD-Supported Research” dated March 25, 2002, produced by  
14 Defendants with Bates labels VET113-000104 through VET113-000112.

15          33.     Attached hereto as Exhibit 31 is a true and correct copy of what I am informed and  
16 believe is Department of Defense Directive 6200.2, “Use of Investigational New Drugs for Force  
17 Health Protection” dated August 1, 2000.

18          34.     Attached hereto as Exhibit 32 is a true and correct copy of what I am informed and  
19 believe is a document with the subject, “Implementation Plan for U.S. Chemical and Biological  
20 (CB) Tests Repository Program,” approved by Jean Reed, produced by Defendants at Bates labels  
21 DVA002 004549 through DVA002 004551 and Deposition Exhibit No. 199 in this case.

22          35.     Attached hereto as Exhibit 33 is a true and correct copy of what I am informed and  
23 believe is a memorandum with subject “Release from ‘Secrecy Oaths’ Under Chemical and  
24 Biological Weapons Human Subject Research Programs,” dated January 11, 2011 and produced  
25 by Defendants at Bates labels VET021-000001 through VET021-000002 and Deposition Exhibit  
26 No. 332 in this case.

27          36.     Attached hereto as Exhibit 34 is a true and correct copy of what I am informed and  
28 believe are Compensation and Pension Service meeting minutes for a meeting held on March 30,

1 2006, dated April 1, 2006, produced by Defendants at Bates labels DVA003 007671 through  
2 DVA003 007674 and Deposition Exhibit No. 285 in this case.

3 37. Attached hereto as Exhibit 35 is a true and correct copy of what I am informed and  
4 believe is an email with attachments, produced by Defendants at Bates labels VET140-002110  
5 through VET140-002112 and Deposition Exhibit No. 809 in this case.

6 38. Attached hereto as Exhibit 36 is a true and correct copy of what I am informed and  
7 believe are Compensation and Pension Service meeting minutes dated June 3, 2005, produced by  
8 Defendants at Bates labels DVA003 006754 through DVA003 006761 and Deposition Exhibit  
9 No. 796 in this case.

10 39. Attached hereto as Exhibit 37 is a true and correct copy of what I am informed and  
11 believe is an email with attachments, produced by Defendants at Bates labels VET140-002114  
12 through VET140-002119 and Deposition Exhibit No. 811 in this case.

13 40. Attached hereto as Exhibit 38 is a true and correct copy of excerpts from the  
14 transcript of the November 4, 2011 deposition of Paul Black.

15 41. Attached hereto as Exhibit 39 is a true and correct copy of what I am informed and  
16 believe is a table reflecting outreach letters mailed and returned, produced by Defendants at Bates  
17 labels DVA006 104636 through DVA006 104639 and Deposition Exhibit No. 580 in this case.

18 42. Attached hereto as Exhibit 40 is a true and correct copy of what I am informed and  
19 believe is an document entitled, "Outreach Efforts of Project 112/SHAD, Mustard Gas and  
20 Chemical Biological Programs as of January 31, 2010," prepared by Procedures Staff,  
21 Compensation and Pension Service, dated February 5, 2010, produced by Defendants at Bates  
22 labels DVA004 014448 through DVA004 014452 and Deposition Exhibit No. 581 in this case.

23 43. Attached hereto as Exhibit 41 is a true and correct copy of excerpts from the  
24 transcript of Volume II of the deposition of Michael Kilpatrick, dated July 7, 2011.

25 44. Attached hereto as Exhibit 42 is a true and correct copy of what I am informed and  
26 believe are Compensation and Pension Service meeting minutes dated November 29, 2004,  
27 produced by Defendants at Bates labels DVA003 006436 through DVA003 006440 and  
28 Deposition Exhibit No. 269 in this case.



1           45.     Attached hereto as Exhibit 43 is a true and correct copy of excerpts from the  
2 transcript of the July 6, 2011 deposition of Dee Dodson Morris.

3           46.     Attached hereto as Exhibit 44 is a true and correct copy of what I am informed and  
4 believe is an excerpt of the MKULTRA Briefing Book, dated January 1, 1976 and beginning at  
5 Bates label MKULTRA0000190090\_0001, and is also an excerpt of Deposition Exhibit 594 in  
6 this case.

7           47.     Attached hereto as Exhibit 45 is a true and correct copy of what I am informed and  
8 believe is a January 31, 1975 James Hirsch Memorandum: ORD Research and Development for  
9 Intelligence Applications of Drugs, and attachment "Influencing Human Behavior," produced by  
10 Defendants with the Bates labels VET001\_009239 through VET001\_009247 and Deposition  
11 Exhibit 542 in this case.

12           48.     Attached hereto as Exhibit 46 is a true and correct copy of what I am informed and  
13 believe are excerpts from four reports to Congress regarding Medical Research in the Veterans'  
14 Administration, prepared by The Department of Medicine and Surgery of the Veterans'  
15 Administration, dated April 26, 1957, May 6, 1958, January 30, 1959, and January 15, 1970.

16           49.     Attached hereto as Exhibit 47 is a true and correct copy of what I am informed and  
17 believe is Training Letter 06-04, dated September 12, 2006, produced by Defendants at Bates  
18 labels VET001\_015121 through VET001\_015134 and Deposition Exhibit No. 296 in this case.

19           50.     Attached hereto as Exhibit 48 is a true and correct copy of what I am informed and  
20 believe is Training Letter 05-01, dated March 28, 2005, produced by Defendants at Bates labels  
21 VET001\_014953 through VET001\_014970 and Deposition Exhibit No. 588 in this case.

22           51.     Attached hereto as Exhibit 49 is a true and correct copy of what I am informed and  
23 believe is the Under Secretary for Health Information Letter IL 10-2006-010, dated August 14,  
24 2006, and produced by Defendants at Bates labels VET001\_015606 through VET001\_015609  
25 and Deposition Exhibit No. 275 in this case.

26           52.     Attached hereto as Exhibit 50 is a true and correct copy of what I am informed and  
27 believe is the Under Secretary for Health Information Letter IL 10-2005-004, dated March 14,  
28 2005, and produced by Defendants at Bates labels DVA012 001252 through DVA012 001266.



1           53.     Attached hereto as Exhibit 51 is a true and correct copy of what I am informed and  
2 believe is an outreach letter from Daniel Cooper, Acting Under Secretary for Benefits, dated  
3 June 30, 2006 and produced by Defendants at Bates labels VET001\_014266 through  
4 VET001\_014271 and Deposition Exhibit No. 264 in this case.

5           54.     Attached hereto as Exhibit 52 is a true and correct copy of what I am informed and  
6 believe is an email from Mark Brown to Kenneth Hyams and others, dated June 29, 2006,  
7 produced by Defendants at Bates labels DVA052 000113 through DVA052 000114 and  
8 Deposition Exhibit No. 727 in this case.

9           55.     Attached hereto as Exhibit 53 is a true and correct copy of what I am informed and  
10 believe is a mustard gas outreach letter from Daniel Cooper, Under Secretary for Benefits,  
11 undated, produced by Defendants at Bates labels DVA012 000269 through DVA012 000271 and  
12 Deposition Exhibit No. 766 in this case.

13           56.     Attached hereto as Exhibit 54 is a true and correct copy of what I am informed and  
14 believe is a Sample Partial-Body Mustard Gas Veteran Notification Letter from Daniel Cooper,  
15 Under Secretary for Benefits, undated, produced by Defendants at Bates labels VET001\_015113  
16 through VET001\_015115 and Deposition Exhibit No. 767 in this case.

17           57.     Attached hereto as Exhibit 55 is a true and correct copy of what I am informed and  
18 believe is a Sample Surviving Spouse Mustard Gas Veteran Notification Letter from Daniel  
19 Cooper, Under Secretary for Benefits, undated, produced by Defendants at Bates labels  
20 VET001\_015116 and Deposition Exhibit No. 352 in this case.

21           58.     Attached hereto as Exhibit 56 is a true and correct copy of what I am informed and  
22 believe is a report on Outreach Activities prepared by the Department of Veterans Affairs,  
23 produced by Defendants with the Bates labels DVA003 013242 through DVA003 013253 and  
24 Deposition Exhibit 299 in this case.

25           59.     Attached hereto as Exhibit 57 is a true and correct copy of what I am informed and  
26 believe is a document entitled, "Outreach Activities, Compensation and Pension Service," dated  
27 September 2009, produced by Defendants at Bates labels VET001\_410 through VET001\_420 and  
28 Deposition Exhibit No. 286 in this case.

1           60.     Attached hereto as Exhibit 58 is a true and correct copy of what I am informed and  
2 believe is a document entitled, “Briefing Book for 28 September 1994 Hearing Before the  
3 Subcommittee on Legislation and National Security of the Committee on Government  
4 Operations, Volume II: Chemical and Biological Warfare and Drug Testing,” Deposition Exhibit  
5 No. 635 in this case.

6           61.     Attached hereto as Exhibit 59 is a true and correct copy of what I am informed and  
7 believe is a document entitled, “Hearing on Experiments with Human Test Subjects, Briefing  
8 Book for April 27, 1994,” produced by Defendants at Bates labels VET122-001617 through  
9 VET122-001622 and Deposition Exhibit No. 689 in this case.

10          62.     Attached hereto as Exhibit 60 is a true and correct copy of what I am informed and  
11 believe is a document entitled, “Chemical Weapons Exposure Study Update, July 1993,” prepared  
12 by Office of the Director, Information Resources Management, Office of the Assistant Secretary  
13 of Defense, produced by Defendants at Bates labels VET123-004120 through VET123-004153  
14 and Deposition Exhibit No. 696 in this case.

15          63.     Attached hereto as Exhibit 61 is a true and correct copy of Defendant Department  
16 of Defense and Department of Army’s Objections and Responses to Plaintiffs’ Amended Set of  
17 Requests for Admission, served on August 15, 2011 and an excerpt of Deposition Exhibit 685 in  
18 this case.

19          64.     Attached hereto as Exhibit 62 is a true and correct copy of what I am informed and  
20 believe is an email from Anthony Lee to Capt. Omar Hottenstein and others, dated May 21, 2010  
21 and produced by Defendants at Bates label DVA003 006674 and Deposition Exhibit No. 469 in  
22 this case.

23          65.     Attached hereto as Exhibit 63 is a true and correct copy of what I am informed and  
24 believe is an email from Glen Wallick to Elizabeth Burke and others, dated February 14, 2010,  
25 and produced by Defendants at Bates labels DVA002 025799 through DVA002 025800 and  
26 Deposition Exhibit No. 287 in this case.

27          66.     Attached hereto as Exhibit 64 is a true and correct copy of excerpts from the  
28 transcript of the June 29, 2011 deposition of Joseph Salvatore.

1           67. Attached hereto as Exhibit 65 is a redacted true and correct copy of what I am  
2 informed and believe is a Volunteer's Participation Agreement for a Named Plaintiff, produced  
3 by Defendants at Bates labels VET034-010680 through VET034-010681.

4           68. Attached hereto as Exhibit 66 is a true and correct copy of what I am informed and  
5 believe is a Vietnam Veterans of America web site "Who We Are," at [www.vva.org/who.html](http://www.vva.org/who.html),  
6 accessed on February 8, 2012.

7           69. Attached hereto as Exhibit 67 is a true and correct copy of Morrison and Foerster's  
8 web site "Offices," at [www.mofo.com/offices/](http://www.mofo.com/offices/), accessed on February 6, 2012.

9           70. Attached hereto as Exhibit 68 is a true and correct copy of excerpts from the  
10 transcript of the June 13, 2011 deposition of David C. Dufrane.

11           71. Attached hereto as Exhibit 69 is a true and correct copy of excerpts from the  
12 transcript of the October 12, 2011 deposition of Veteran A, whose identity is protected because he  
13 is a third-party putative class member and not a named plaintiff.

14           72. Attached hereto as Exhibit 70 is a true and correct copy of excerpts from the  
15 transcript of the October 13, 2011 deposition of Veteran B, whose identity is protected because he  
16 is a third-party putative class member and not a named plaintiff.

17           73. Attached hereto as Exhibit 71 is a true and correct copy of excerpts from the  
18 transcript of the October 14, 2011 deposition of Veteran C, whose identity is protected because he  
19 is a third-party putative class member and not a named plaintiff.

20           74. Attached hereto as Exhibit 72 is a true and correct copy of excerpts from the  
21 transcript of the October 11, 2011 deposition of Veteran D, whose identity is protected because he  
22 is a third-party putative class member and not a named plaintiff.

23           75. Attached hereto as Exhibit 73 is a true and correct copy of Plaintiff Vietnam  
24 Veterans of America's Amended and Supplemental Responses to Defendants' Interrogatories  
25 Numbers 19 & 22, served on June 17, 2011 and Deposition Exhibit No. 240 in this case.

26           76. Attached hereto as Exhibit 74 is a true and correct copy of Plaintiff Swords to  
27 Plowshares' Amended and Supplemental Responses to Defendants' Interrogatories Numbers 3 &  
28 20, served on August 24, 2011.

1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct and that this Declaration was executed in San Francisco, California  
3 on this 28th day of February, 2012.

4  
5 /s/ Stacey M. Sprenkel  
6 Stacey M. Sprenkel  
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