

Exhibit T



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February 29, 2012

VIA ELECTRONIC MAIL

Mr. Ben Patterson
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. Patterson:

I write to follow-up on an outstanding issue. During his deposition, David Abbot testified that he backed up all of his files on a "server." This testimony is also reflected in deposition exhibit 777, which is an email from Mr. Abbot to Glen Wallick dated May 2, 2007.

When Josh Gardner and I spoke to Mr. Abbot to clarify what he meant by a "server," he explained that he had likely saved these files onto his personal hard drive. Mr. Gardner and I then spoke to the Department of Veterans Affairs' (VA) Information Technology (IT) staff, who explained that when Mr. Abbot left VA in June 2008, pursuant to VA's IT policy, his hard drive would have been erased.

Late last week, during preparations to move an old Veterans Benefits Administration server to another location, VA IT discovered a folder that was marked with Mr. Abbot's name and the letters "CB." It appears the file was created on May 2, 2007. VA is currently reviewing the contents of this file, but it appears to contain Mr. Abbot's files related to Chem-Bio, including the Chem-Bio mailbox. In accordance with its previous position, VA will produce to Plaintiffs all responsive, non-privileged documents contained in this file.

Finally, VA will search the remainder of this server to ensure that it contains no additional documents that may be responsive to Plaintiffs' discovery requests.

I trust that this information resolves this issue, and there is no need to include it in Plaintiffs' Motion to Compel. Please feel free to contact me with any questions or concerns.

Best regards,

A handwritten signature in black ink that reads "Lily Farel". The signature is written in a cursive style with a large, prominent "L" and "F".

Lily Farel
Trial Attorney
Federal Programs Branch
United States Department of Justice