

Exhibit D, Declaration of Clyde Bennett

1 IAN GERSHENGORN
 Deputy Assistant Attorney General
 2 JOSEPH P. RUSSONIELLO
 United States Attorney
 3 VINCENT M. GARVEY
 Deputy Branch Director
 4 CAROLINE LEWIS WOLVERTON
 District of Columbia Bar No. 496433
 Trial Attorney
 6 Civil Division, Federal Programs Branch
 U.S. Department of Justice
 7 P.O. Box 883
 8 Washington, D.C. 20044
 Telephone: (202) 514-0265
 9 Facsimile: (202) 616-8470
 E-mail: caroline.lewis-wolverton@usdoj.gov

10 Attorneys for DEFENDANTS

11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA
 13 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.)	CLYDE BENNETT
)	
18 CENTRAL INTELLIGENCE AGENCY,)	
19 <i>et al,</i>)	
)	
20 Defendants.)	
)	


21
22 I, Clyde Bennett, hereby declare as follows:

- 23 1. I am the Assistant Privacy Officer in the Department of Veterans Affairs, VA
 24 Regional Office, Nashville, Tennessee ("Nashville VA Regional Office"). In this capacity, I am
 25 familiar with how the records of the Nashville VA Regional Office are kept and maintained.
 26 2. This declaration is based on my personal knowledge of the Nashville VA Regional
 27 Office's recordkeeping policies and procedures as well as on the records of that office.
 28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

3. The pages attached hereto are true and accurate copies of excerpts of the Nashville VA Regional Office's Claims File of Bruce T. Price. The Claims File of Bruce T. Price is maintained in the Claims File System, which is kept and maintained in the Nashville VA Regional Office's course of regularly conducted business activity.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Nashville, Tennessee on June 26, 2009.



CLYDE BENNETT