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10 Attorneys for Plaintiffs  
 Vietnam Veterans of America; Swords to  
 11 Plowshares: Veterans Rights Organization;  
 Bruce Price; Franklin D. Rochelle; Larry  
 12 Meirow; Eric P. Muth; David C. Dufrane; and  
 Wray C. Forrest  
 13

14 UNITED STATES DISTRICT COURT  
 15 NORTHERN DISTRICT OF CALIFORNIA  
 16 OAKLAND DIVISION  
 17

18 VIETNAM VETERANS OF AMERICA, *et al.*,  
 19 Plaintiffs,  
 20 v.  
 21 CENTRAL INTELLIGENCE AGENCY, *et al.*,  
 22 Defendants.  
 23

Case No. CV 09-0037-CW

**DECLARATION OF TIMOTHY W.  
 BLAKELY IN SUPPORT OF  
 PLAINTIFFS' REPLY IN SUPPORT  
 OF MOTION FOR PROTECTIVE  
 ORDER AND TO OVERRULE  
 OBJECTIONS**

Complaint filed January 7, 2009

1 I, Timothy W. Blakely, 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 a partner 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 and Wray C. Forrest (“Plaintiffs”) in this action. I submit this Declaration in Support of  
7 Plaintiffs’ Reply in Support of Motion for Protective Order. I make this Declaration based on  
8 personal knowledge. If called as a witness, I would testify to the facts set forth below.

9 2. Counsel for the parties held a meet-and-confer teleconference on September 23,  
10 2010. Among other things, the parties discussed their respective positions concerning a  
11 protective order for this action.

12 3. Attached as Exhibit A is a true and correct copy of a September 30, 2010 letter  
13 from Timothy W. Blakely, counsel for Plaintiffs, to Brigham Bowen, counsel for Defendants.

14 4. Attached as Exhibit B is a true and correct copy of an October 8, 2010 letter from  
15 Lily Farel, counsel for Defendants, to Timothy W. Blakely, counsel for Plaintiffs.

16 5. Attached as Exhibit C is a true and correct copy of an October, 2010 letter from  
17 Timothy Blakely, counsel for Plaintiffs, to Lily Farel, counsel for Defendants.

18  
19 I declare under penalty of perjury under the laws of the United States of America that the  
20 foregoing is true and correct and that this Declaration was executed in San Francisco, California  
21 on this 13th day of October 2010.

22  
23 /s/ Timothy W. Blakely  
24 Timothy W. Blakely  
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**Attestation Pursuant to General Order 45, section X.B**

I hereby attest that I have on file all holograph signatures for any signatures indicated by a “conformed” signature (/S/) within this efiled document.

\_\_\_\_\_  
/s/ GORDON P. ERSPAMER  
Gordon P. Erspamer

## Other Supporting Documents

[4:09-cv-00037-CW Vietnam Veterans of America et al v. Central Intelligence Agency et al](#)

ADRMOPTERM, E-Filing

U.S. District Court  
Northern District of California  
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The following transaction was received from by Erspamer, Gordon entered on 10/13/2010 4:49 PM and filed on 10/13/2010

**Case Name:** Vietnam Veterans of America et al v. Central Intelligence Agency et al

**Case Number:** [4:09-cv-00037-CW](#)

**Filer:** Swords to Plowshares  
Veterans Rights Organization  
Vietnam Veterans of America  
Bruce Price  
Franklin D. Rochelle  
Larry Meirow  
Eric P. Muth  
David C. Dufrane  
Wray C. Forrest

**Document Number:** [164](#)

**Docket Text:**

**[Declaration of Timothy W. Blakely in Support of \[163\] Reply Memorandum, in Support of Motion for Protective Order and to Overrule Objections filed by David C. Dufrane, Wray C. Forrest, Larry Meirow, Eric P. Muth, Bruce Price, Franklin D. Rochelle, Swords to Plowshares, Veterans Rights Organization, Vietnam Veterans of America. \(Attachments: # \(1\) Exhibit A, # \(2\) Exhibit B, # \(3\) Exhibit C\)\(Related document\(s\) \[163\]\) \(Erspamer, Gordon\) \(Filed on 10/13/2010\)](#)**

**4:09-cv-00037-CW Notice has been electronically mailed to:**

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**4:09-cv-00037-CW Please see [General Order 45 Section IX C.2 and D](#); Notice has NOT been electronically mailed to:**

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**C:\Documents and Settings\keb1

\Desktop\Fax\_File\_or\_Docket\Decl\_ISO\_Reply\_Brief\_-\_Mot\_for\_Protective\_Order.pdf

**Electronic document Stamp:**

[STAMP CANDStamp\_ID=977336130 [Date=10/13/2010] [FileNumber=6808796-0]

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f44d987168f0db439f9a5904cdd07b380be96fe77925fe1f278dae858a58]]

**Document description:**Exhibit A

**Original filename:**C:\Documents and Settings\keb1\Desktop\Fax\_File\_or\_Docket\Exhibit A 2010-

09-30 Letter to Bowen with Attachment.pdf

**Electronic document Stamp:**

[STAMP CANDStamp\_ID=977336130 [Date=10/13/2010] [FileNumber=6808796-1]

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de2eachb8cb01192987067348bfff120349eb4dfa58aa110e298aaaf024c1]]

**Document description:**Exhibit B

**Original filename:**C:\Documents and Settings\keb1\Desktop\Fax\_File\_or\_Docket\Exhibit B 2010-

10-08 Letter from DoJ re proposed protective order.pdf

**Electronic document Stamp:**

[STAMP CANDStamp\_ID=977336130 [Date=10/13/2010] [FileNumber=6808796-2]

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eddb9473426363f75edffca006fd456d92d6c7daa847bae54b27826b09f0]]

**Document description:**Exhibit C

**Original filename:**C:\Documents and Settings\keb1\Desktop\Fax\_File\_or\_Docket\Exhibit C 2010-10-11 Letter to Farel with Attachment.pdf

**Electronic document Stamp:**

[STAMP CANDStamp\_ID=977336130 [Date=10/13/2010] [FileNumber=6808796-3]  
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