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

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

13
14 VIETNAM VETERANS OF AMERICA *et al.*,
15 Plaintiffs,
16 v.
17 CENTRAL INTELLIGENCE AGENCY *et al.*,
18 Defendants.
19

Case No. CV 09-0037-CW

**DECLARATION OF JAMES R.
HANCOCK IN SUPPORT OF
PLAINTIFFS' UNOPPOSED
ADMINISTRATIVE MOTION TO
ACCEPT BILL OF COSTS UNDER
28 U.S.C. § 2412 AND VACATE
CLERK'S NOTICE OF DEFICIENCY**

Complaint filed January 7, 2009

1 I, James R. Hancock, 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, Eric P. Muth, David C. Dufrane, Tim Michael
6 Josephs, and William Blazinski (“Plaintiffs”) in this action. I submit this Declaration in Support
7 of Plaintiffs’ Unopposed Administrative Motion to Accept Bill of Costs Under 28 U.S.C. § 2412
8 and Vacate Clerk’s Notice Of Deficiency. I make this Declaration based on my personal
9 knowledge, and, if called as a witness, I would testify to the facts set forth below.

10 2. On August 9, 2017, I called the clerk’s office to inquire about the notice of
11 deficiency and clarify the deadline, in an attempt to avoid burdening the Court with briefing on
12 the issue. We did not reach an agreement regarding the deadline.

13 3. On July 11, 2017, Nicholas Cartier, counsel for Defendants, sent an initial draft
14 stipulation to Plaintiffs’ counsel. Defendants’ proposed initial draft included language identical
15 to paragraphs 1 and 2 of the final version filed on July 12, 2017 (ECF No. 601), and the Court’s
16 order dated July 17, 2017 (ECF No. 602).

17 4. On August 16, 2017, I contacted counsel for Defendants to inform them of the
18 present motion and seek a stipulation, citing Civil Local Rule 7-11(a). Cesar Lopez-Morales,
19 counsel for Defendants, responded that Defendants do not oppose the motion and agreed that the
20 stipulation entered by the Court is still in effect.

21 I declare under penalty of perjury under the laws of the United States of America that the
22 foregoing is true and correct and that this Declaration was executed in Palo Alto, California, on
23 this 17th day of August, 2017.

24
25 
26 _____
27 James R. Hancock
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