

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

JOHN EAKIN
Plaintiff,

v.

AMERICAN BATTLE MONUMENTS
COMMISSION; et al.,

Defendants

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CASE NUMBER: SA-12-CA-1002-FB-HB

PLAINTIFFS' FIRST REQUEST FOR PRODUCTION

Plaintiff John Eakin, through undersigned counsel, submits the following First Request for Production of Documents to Defendants American Battle Monuments (ABMC), Max Cleland, U.S. Department of Defense (DoD), Chuck Hagel, W. Montague Winfield and Johnnie E. Webb to be responded to within thirty (30) days of service in accord with Rule 34 of the Federal Rules of Civil Procedure.

DEFINITIONS

1. "Plaintiff" means and refers to the plaintiff in this lawsuit, John Eakin.
2. "Defendants" means and refers to the defendants in this lawsuit, American Battle Monuments Commission, Max Cleland, U.S. Department of Defense, Chuck Hagel, W. Montague Winfield and Johnnie E. Webb, individually and collectively, as contextually appropriate, including any persons associated with them or authorized to act on their behalf, including any employees or officials or agencies therein.
3. "Tom Holland" means Thomas D. Holland, Scientific Director, JPAC-CIL.

4. “Kelly K. McKeague” means Major General Kelly K. McKeague, USAF, Commander JPAC.

5. “Robert Richeson” means Robert Richeson, J2 Section, JPAC and successor organizations.

6. “Lawrence Gonzales” means Lawrence Gonzales, J2 Section, JPAC and successor organizations.

7. “You” and “your” means and refers to Defendants and any persons associated with it, including, but not limited to, subsidiaries or affiliated entities, officers, directors, employees, agents, representatives, predecessors, successors, assigns, attorneys, and/or any of them.

8. The words “relate, ” “relating, ” “pertain, ” “pertaining, ” “reference, ” “referencing, ” “refer, ” “referring, ” and/or derivatives thereof, whether followed by a preposition or not, have the broadest meaning that may be accorded to them and include, but are not limited to, the following: directly or indirectly mentioning, describing, referring to, pertaining to, being connected with, setting forth, discussing, commenting upon, analyzing, supporting, contradicting, proving, disproving, referring to, constituting, concerning, and/or connected, or reflecting in any way upon the stated subject matter of a given request.

9. “Person” and “persons” mean any individual, corporation, firm, company, partnership, joint venture, association, unincorporated association, governmental or public agency, and/or all other legal entities.

10. “Document, ” “documents and things, ” and “electronically stored information” (“ESI”) have the fullest meaning and applicable scope as possible under Rule 34 of the Federal Rules of Civil Procedure, Rule 1001 of the Federal Rules of Evidence and as construed by the

case law in this Circuit. Those terms include, without limitation, each document, thing, and electronic or computerized records, files, and data in your possession, custody, or control, whether a copy, draft, or original, wherever located physically, electronically, or otherwise, with all exhibits, attachments, appendices, work notes and schedules related thereto.

11. “Communication” includes any form of intended, attempted, or actual oral, written, graphic, electronic, or other representation or articulation from one or more persons to one more persons.

12. “Identify” means:

A. in the case of a natural person, documents that state his or her name, business address, title or position, and/or last known business and home telephone number; and

B. in the case of a non-natural person, documents that state the full name, the address of the principal place of business, the telephone number, and/or the name of its chief executive officer and/or president.

13. The terms “each” and “every” include the term “each and every.” “Any” shall include the term “any and all.”

14. The singular of words includes the plural and the plural includes the singular. Masculine, feminine, or neuter pronouns include the other gender(s).

15. The words “and” and “or” have either a disjunctive or conjunctive meaning so as to bring within the scope of these document requests all information that might otherwise be construed to be outside their scope by use of a more restrictive meaning.

16. “Case file” refers to either a collection of related documents or individual documents pertaining to the designated person or event and includes all supporting or referenced documents.

17. “Family reference sample” or “FRS” means a human tissue sample containing Deoxyribonucleic acid (DNA) and intended to assist in the identification of human remains to determine common ancestry. It may also refer to a text narrative or coded representation of DNA rather than a tissue sample containing DNA. The term DNA is used generically to include mitochondrial, nuclear and various related portions and tests.

18. “Field recovery” means the recovery of human remains from other than a designated cemetery.

19. “Unknown” refers to any human remains the identity of which is unknown or which have been designated as non-recoverable even if the identity is known or believed to be known. Includes remains currently interred in a designated cemetery or stored in a designated identification laboratory.

20. “Knowns” refers to any human remains the identity of which has been determined, correctly or incorrectly.

21. “X numbers” or “X files” are the reference numbers assigned to unidentified remains or the documents pertaining to them.

22. “Grave 717” refers to those persons interred in, or human remains recovered from, Cabanatuan POW Camp Cemetery grave number 717. These persons may be known individually by any of the following names, designations or Manila American Military Cemetery grave locations.

- Nichols, Harvey A. 7009171
- Gutierrez, Juan E. 20843125
- Hanscom, Lawrence 6137280
- Bain, Daniel C. 33035131
- Collins, Fredrick G. 6578818
- Simmons, George G. 19019886
- York, George S Civilian
- Kovach, John 20500764

- Hirschi, Harold S. 19038407
- Lobdell, Lloyd J. 20645267
- Overbey, Evans E. 13035026
- Ruark, John W. 278681
- Waid, Charles M. 19049058
- Kelder, Arthur H. 36016623
- Cabanatuan Burial Roster # 2267 thru 2279 inclusive
- Cabanatuan Cemetery unknowns C272 thru C284 inclusive
- Manila #2 unknowns X812 thru X824 inclusive
- Manila Mausoleum unknowns X4849 thru X4858
- Manila American Military Cemetery, formerly known as Ft. McKinley Cemetery, graves N-2-69, N-14-78, L-14-49, A-12-195 11, C-5-78, N-5-187, C-9-78, N-14-93, N-11-97, N-11-190

23. Unless otherwise specified, the requested documents pertain to all deceased U.S. military personnel whose date of death was during the period from January 1, 1941 to December 31, 1945 or other generally recognized duration of World War II.

24. “Arthur H. Kelder” means the late Private Arthur Herman Kelder, U.S. Army service number 36016623.

25. “Central Identification Laboratory” “CIL-HI” or “CIL” means the Central Identification Laboratory, a component of and predecessor of JPAC.

INSTRUCTIONS

1. All documents, electronically stored information (ESI) or other tangible things are to be produced at 8438 Fountain Circle, San Antonio, TX 78229. Documents, ESI or other tangible things impractical to produce at the requested address should be made available in the Western District of Texas at a mutually agreed time and location negotiated by counsel.

2. Plaintiff reserves the right to conduct destructive and/or consumptive testing on documents and tangible things produced to Plaintiff. The time, place and proposed test protocol will be provided to Counsel for Defendants at least fourteen (14) days in advance of any such testing.

3. Data primarily archived by Defendants in an electronic format must be provided to Plaintiff in a similar format usable by Plaintiff. All “electronically stored information” (ESI) must be forensically identical to the original including all metadata and dates of creation or modification. Such data may be provided on portable hard disk drives, DVD’s or other mutually agreeable format providing no data or information is modified or lost. Electronically stored data which requires proprietary software to access may be provided in a generic file format such as comma delimited (.csv) if complete data schema are provided which enable reconstruction of the table structure.

4. As used herein, the terms “Document” or “Documents” shall include “things” as well as “ESI.” All documents, things and ESI responsive to a request should be produced, including, without limitation, each copy of an original that differs in any way from the original, whether such difference is caused by deletions, markings on the front or back, format, or any other cause.

5. While portable document format (.PDF) files are preferred in lieu of any other type of photographic reproduction or copy, the submission on any non-original document includes a waiver of any objection as to the authenticity of said electronic copy as true and original copies of the originals, should such copies be offered into evidence. Submission of such copies or reproductions shall constitute such a waiver and the submitting party is thereafter precluded from tendering an objection. Absent such waiver, only original documents should be submitted.

6. Documents and things produced in response to these requests shall be produced together with copies of file labels, dividers, and other identifying markers with which they were associated in the ordinary course of business.

7. Documents, things and ESI produced in response to these requests shall be produced in their entirety, without abbreviation or expurgation, and without redacting any portion therefrom.

8. Documents, things and ESI produced in response to these requests shall be specifically identified or described and further identified as to the request number to which it is responsive.

9. Documents, things and ESI produced in response to multiple requests shall indicate each and every request to which they are responsive.

10. Documents, things and ESI produced in response to these requests shall be produced in a form that renders the material intelligible, legible, and/or capable of reproduction.

11. If any request herein cannot be complied with in full, it shall be complied with to the extent possible, and you should explain why full compliance is not possible.

12. If there are responsive documents, things or ESI within your possession, custody, or control that are privileged or otherwise cannot be produced, please so state. For each such document, thing or ESI, please prepare and submit to Plaintiff a log identifying all information that you contend supports your claim that such information must be withheld, including, without limitation, the following: (a) the privilege(s) or reason(s) for withholding production; (b) the nature of the document or thing (letter, memorandum, handwritten notes, software, audio recording, etc.); (c) date; (d) author(s) and recipient(s); (e) each person to whom such information was available; (f) a general description of the subject matter; and (g) "Bates" or production control numbers. Provide said log at the time of production.

13. Documents, things and ESI produced in response to these requests may be responsive to more than one request. The presence of such duplication shall not be interpreted to

narrow or limit the scope of each request. Where a document, thing or ESI is responsive to more than one request, only one copy may be produced. However, you must identify each request to which the duplicate document or thing is responsive.

14. If any requested document, thing or ESI is no longer in your possession, custody, or control, state in detail all of the reason(s) why and identify each such responsive document or thing by author, date, subject matter, addressee, audience, and/or recipient, the number of pages and, where applicable, any other indicator of volume or size.

15. These document requests are continuing so as to require supplemental production as required by the Federal Rules of Civil Procedure.

REQUESTS FOR PRODUCTION

1. Produce the memorandum from the Office of the Undersecretary of Defense, subject: Policy Guidance on Prioritization of Remains Recovery and Identifications, dated: December 16, 2010 and signed by Robert J. Newberry along with all related documents such as studies, budget requests, staff approvals or correspondence upon which this policy is based.

2. Produce the memorandum from the Office of the Undersecretary of Defense, subject: Disinterment Policy for the Purpose of Identification, dated: May 13, 1999 and signed by Walter B. Slocombe along with all related documents such as studies, budget requests, staff approvals or correspondence upon which this policy is based

3. Produce all documents in Defendant's possession or the possession of any person or agency subordinate to Defendant and pertaining to Arthur H. Kelder or Plaintiff John Eakin along with all documents created or received in response to such documents.

4. Produce all documents including case files, email, correspondence, memoranda and reports pertaining to JPAC Incident 425, Cabanatuan Grave 717, any occupant of Grave 717, Arthur H. Kelder or Plaintiff John Eakin.

5. Produce all textual or hardcopy reports of family reference samples (DNA) related to any occupant of Cabanatuan Grave 717.

6. Produce all case files related to any occupant of Cabanatuan Grave 717 including all correspondence, email, reports or genealogical files.

7. Produce all case files, personnel files, investigative files or similar individual document pertaining to JPAC incident 425, grave 717, or any individual known to have been interred in grave 717 which were produced, received or maintained by agencies of Defendants.

8. Produce all personnel files including, but not limited to, those described by 10 USC § 1506 pertaining to those persons interred in Cabanatuan Grave 717.

9. Produce all documents related to Case No. 7671 referenced on page 9, WAID IDPF (Plf. Ex. 16M).

10. Produce all documents related to Case No. 8681 referenced on page 11, SIMMONS IDPF (Plf. Ex. 16L).

11. Produce all documents related to Case No. 7363 referenced on page 15, KOVACH IDPF (Plf. Ex. 16G).

12. Produce all files identified as 550-2-2, 558-2, and 558-8 referenced on page 7, KOVACH IDPF (Plf. Ex. 16G).

13. Produce the file identified as AG RPD File 999-5-13-2 on page 12, LOBDELL IDPF, (Plf. Ex. 16H).

14. Produce all documents related to Case No. 7358 referenced on page 28, KELDER IDPF, (Plf. Ex. 16F).
15. Produce all files identified as 999-5-13-(1 thru 3) referenced on page 29, KELDER IDPF, (Plf. Ex. 16F).
16. Produce all documents related to Case No. 6535 referenced on page 10, HIRSCHI IDPF, (Plf. Ex. 16E).
17. Produce all documents related to Case No. 7808 referenced on page 10, COLLINS IDPF, (Plf. Ex. 16B).
18. Produce all files identified as 999-5-13-(1 thru 3) referenced on page 11, COLLINS IDPF, (Plf. Ex. 16B).
19. Produce all files identified as 550-2-2, 558-2, and 558-8 referenced on page 4, BAIN IDPF, (Plf. Ex. 16A).
20. Produce all documents related to disinterment and reinturment of unknown remains X816 from grave N-11-101 on 21 Feb 50 to grave A-12-195 11 Feb 52 at Manila American Military Cemetery.
21. Produce all documents related to disinterment and reinturment of unknown remains X815 from grave N-4-101 to grave L-14-49 at Manila American Military Cemetery including cost, authority and similar documents.
22. Produce all documents pertaining to Identification Board Proceedings involving any occupant of grave 717 to include recommendations, correspondence or similar documents.
23. Produce all documents received, processed, issued or in any way relating to grave 717 by the Quartermaster General, Memorial Division.

24. Produce all correspondence between defendants and any family member of grave 717.

25. Produce all other identification memos similar to exhibit 4 to Plaintiff's original complaint, which pertain to, the identification of remains recovered from Cabanatuan Cemetery. (See GUTIERREZ IDPF at 39; NICHOLS IDPF at 29; HANSCOM IDPF at 20 for an example.)

26. Produce all documents referenced in the identification memo identified as exhibit 4 to Plaintiff's original complaint. See GUTIERREZ IDPF at 39; NICHOLS IDPF at 29; HANSCOM IDPF at 20.

27. Produce all documents related to current and prior policies on disinterment of unknowns for the purpose of identification.

28. Produce all documents pertaining to requests or recommendations, both pending and completed, for disinterment from an existing cemetery of unidentified, non-recoverable or unknown U.S. Military personnel. Include all related correspondence, studies, budget, financial mortuary or investigative documents.

29. Produce all cost information, budgets or similar documents for all cemetery disinterments.

30. Produce all documents pertaining to, produced by or which reference a Disinterment Working Group, DWG or other designated group or individual whose duties involved disinterment of deceased American Servicemembers currently buried in a cemetery operated by any agency of the U.S. Government.

31. Produce all documents pertaining to disinterment of WWII era remains, including, but not restricted to, standards for disinterment, investigations, summaries of evidence, analysis, or logistical considerations.

32. Produce all disinterment directives prepared or executed by the Secretary of the Army or his designee and pertaining to disinterment from a cemetery operated by the Department of Veterans Affairs or Defendant ABMC.

33. Produce all Department of Defense or Department of the Army directives pertaining to preparation and signature authority for disinterment directives.

34. Produce all regulations, policy statements, manuals, legal interpretations or directives produced by any Defendant or subordinate military service which pertain to identification of deceased military personnel.

35. Produce all documents relating to recovery of human remains from the Cabanatuan POW camp cemetery including burial rosters, work plans, logs, correspondence or reports.

36. Produce all documents related to the "Cabanatuan Project."

37. Produce all documents which reference a JPAC incident number and which involve an unknown or a disinterment from an existing cemetery including both current and completed cases.

38. Produce all documents related to disinterment of Cabanatuan POW cemetery by US Army Graves Registration Personnel to include burial rosters, death rosters, planning documents, logs of recoveries, photographs or similar documents.

39. Produce all documents related to known or suspected mis-identifications of WWII era remains.

40. Produce all logs or listings of JPAC incident numbers.

41. Produce all Defense Casualty Information Processing System (DCIPS) records pertaining to unknown or non-recoverable deceased U.S. Military personnel.

42. Produce all casualty information database records maintained by Defendants, which pertain to unknown or non-recoverable deceased U.S. Military personnel.
43. Produce all burial rosters pertaining to any WWII POW Camp, sub-camp or work detail.
44. Produce all documents pertaining to disinterments of unknowns from any ABMC operated cemetery to include budget, authorization, contracting or similar documents.
45. Produce all lists or databases of persons from whom a family reference sample is desired or required by Defendants.
46. Produce all lists or databases of persons for whom a family reference sample exists in Defendants' records.
47. Produce all lists or databases of known family members of missing or unaccounted for WWII era American Servicemembers.
48. Produce all lists of family members of missing or unaccounted for WWII era American Servicemembers who have attended a "family briefing" sponsored by Defendants.
49. Produce case files and lists of all missing or unaccounted for WWII era American Servicemembers for whom any person has filed a request for the remains, or the identification, of such missing person.
50. Produce all documents which identify litigation pertaining to any unknowns and which any of Defendants were a named party.
51. Produce all SOP's or directives pertaining to use by Defendants of DNA for identification of remains.
52. Produce all documents which recommend, refuse or discuss the use of nuclear or "y" DNA by CIL as an aid to identification of human remains.

53. Produce all documents which describe the DNA sequencing capability or capacity of any agency of the Department of Defense.

54. Produce all documents which describe the maximum number of DNA samples, by type of DNA tested, which any Department of Defense agency has the capacity to process over a given length of time.

55. Produce all documents which recommend or deny outsourcing of DNA testing to a non Department of Defense organization.

56. Produce all statements of work, requests for proposals or other documents related to outsourcing or contracting with a non-government agency to perform any portion of the MIA accounting process.

57. Provide all press releases, announcements or other similar documents which announce the identification of remains and which refer to the use of DNA testing to assist in identification.

58. Provide all documents pertaining to the above request which describe the actual evidence considered in making the identification of the remains.

59. Provide all documents including minutes, notes or memoranda pertaining to the evaluation of MIA cases by Defendants by any board, commission or other group of more than one person which evaluated or considered cases for further investigation or review.

60. Produce all logs, inventories, backlog reports or other documents containing information on accessions (human remains) stored by any identification laboratory controlled by Defendants.

61. Produce all cost information, budgets or similar documents for field recoveries, prior or planned, which is in the possession of Defendants.

62. Produce all documents alleging, substantiating or investigating misconduct by Kelly McKeague, Johnie Webb, Thomas Holland, Robert Richeson, or Lawrence Gonzales.

63. Produce all documents alleging, substantiating or investigating misconduct by any person assigned to JPAC or DPMO.

64. Produce all documents including emails which were addressed to, from or cc to Kelly McKeague, Johnie Webb, Thomas Holland, Robert Richeson, Lawrence Gonzales and which discussed or mentioned Unknowns, disinterment or exhumation.

65. Produce all documents including emails which were addressed to, from or cc to Kelly McKeague, Johnie Webb, Thomas Holland, Robert Richeson, Lawrence Gonzales and which discussed or mentioned misconduct of any person employed by Defendants in any capacity.

66. Produce all documents pertaining to the employment and/or dismissal of Paul Cole.

67. Produce all documents titled “JPAC Information Value Chain” or similar and including all supporting documents and work notes.

68. Produce all documents titled “The Identification of Missing Persons” or similar and including all supporting documents and work notes.

69. Produce all documents authored by “The Tiger Team” including all supporting documents and work notes.

70. Produce all documents which identify “The Tiger Team.”

71. Produce all documents related to the decision to employ Paul M. Cole, PhD.

72. Produce all documents which allege misconduct in the identification of the remains variously identified as TSN 0673-72, X26, The Viet Nam Unknown or Michael J. Blassie.

73. Produce all documents which allege misconduct in the identification of any unidentified remains.

74. Produce all documents related to studies or inspections of JPAC by the Government Accountability Office, Department of Defense Inspector General or other government agency.

75. Produce all documents which list each identification of human remains by JPAC, subordinate units or predecessor units.

76. Produce all documents which list each accession currently in storage at JPAC or subordinate units.

77. Produce all documents which dispute any identification of human remains by JPAC, subordinate or predecessor units.

78. Produce all documents listing all planned recovery missions.

79. Produce all investigative reports or similar documents drafted by any government or private agency or individual and which were not accepted by the Central Identification Lab (CIL) for further action. Please include all related materials.

80. Produce all documents not accepted by CIL because of formatting discrepancies.

81. Produce all disinterment memos pertaining to MACAR 15077. Include all revisions of this memo produced between February 26, 2011 and October 6, 2011 and all documents rejecting this memo.

82. Produce all ethics complaints which allege poor quality work by any employee of CIL.
83. Produce all documents which provide an inventory of WWII unknowns by cemetery.
84. Produce all documents which list disinterments from any cemetery operated by Defendants or for which Defendants have disinterment authority.
85. Produce all documents which discuss, explain or utilize a “solvability rating” in the evaluation of cases considered by CIL.
86. Produce all documents which define or explain the term “high probability of identification” as used as criteria for disinterment of identification of human remains.
87. Produce all research, background, supporting, decision or discussion documents related to disinterment of remains recovered from the USS Oklahoma.
88. Produce all research, background, supporting, decision or discussion documents related to disposition or disposal of “CIL Portions” of WWII era remains.
89. Produce all research, background, supporting, decision or discussion documents related to burial of multiple “CIL Portions” of WWII era remains as an Unknown.
90. Produce all documents which discuss or consider various options for disposition of unknowns cases.
91. Produce all documents which discuss or offer various estimates of the numerical capability of JPAC to identify unknowns.
92. Produce all documents titled “CIL Disinterment SOP” or similar or which prescribe procedures used by Defendants in disinterment operations.

93. Produce all documents related to the process for requesting exhumation of a grave located in a cemetery under the control of U.S. Government agencies including the U.S. Army, Veterans Affairs, and Defendant ABMC.

94. Produce all documents related to all disinterments/exhumations from cemeteries operated by Defendant ABMC including documents ordering, reporting, funding or contracting for disinterments or exhumations.

95. Produce all documents related to numerical limits on disinterments or exhumations from cemeteries operated by Defendant ABMC.

96. Produce all statutes, regulations, instructions, directives, SOP's or policy statements issued by any Defendant or applicable to any Defendant which pertain to accounting for missing, non-recoverable or unidentified military personnel.

97. Produce all documents pertaining to Marcus Svedicus or which mention Marcus Svedicus in any manner.

98. Produce all documents authored by Paul Cole whether finished or in draft form.

99. Produce all documents pertaining to "resolvability index" including those which use the term to rate various MIA cases.

100. All case reviews or similar documents prepared by Dr. Debra Prince Zinni.

101. All case reviews or similar documents prepared by Dr. Paul D. Emanovsky.

102. All case reviews or similar documents prepared by Rick Stone.

103. All case review or similar documents prepared by Michael Dolski.

104. All documents, including emails, to or from Ben Toyama.

105. All documents which alerted Defendants to the possibility that documents were withheld from the administrative record submitted in Eakin v. ABMC, et al.

106. All case reviews or similar documents prepared by Greg Kupsky.
107. All documents prepared by Dr. Jay Silverstein which expressed concern about the scientific integrity of archaeological fieldwork or other operations or functions of Defendants.
108. All documents prepared by the JPAC J2 section or related offices which pertained to the recovery or identification of WWII U.S. Military personnel buried as Unknowns or whose remains were determined to be non-recoverable.
109. All documents prepared by the Central Identification Laboratory or related offices which pertained to the recovery or identification of WWII U.S. Military personnel buried as Unknowns or whose remains were determined to be non-recoverable.
110. All research memoranda or similar documents pertaining to search, recovery or identification of U.S. Military Personnel in the Republic of the Philippines.
111. Produce all Individual Deceased Personnel Files (IDPF) (293 files) maintained on deceased U.S. Military personnel which exist in a digital or electronic format.
112. Produce all Individual Deceased Personnel Files (IDPF) maintained on the unidentified deceased U.S. Military personnel (“X-files) which exist in a digital or electronic format.
113. Produce the Individual Deceased Personnel Files (IDPF) (293 files) pertaining to all persons originally interred in the Cabanatuan Camps #1 or #3 cemeteries regardless of current format (hardcopy or electronic) and not otherwise produced.
114. Produce the Individual Deceased Personnel Files (IDPF) (293 files or X files) pertaining to all unidentified remains (those identified with a “C” or “X” number and buried in the Manila American Cemetery operated by Defendants ABMC regardless of current format (hardcopy or electronic) and not otherwise produced.

Respectfully submitted,

/S/

Jefferson Moore
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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of May, 2014, I forwarded the foregoing request for production to Defendants by First Class Mail at the following address:

Susan Strawn, Assistant United States Attorney
601 N.W. Loop 410, Suite 600
San Antonio, Texas 78216
Sstrawn@usa.doj.gov

/S/

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Attorney for Plaintiff