

# **EXHIBIT D**

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

JOHN EAKIN,  
Plaintiff,

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v.

NO. SA-10-CA-0784-FB-NN

UNITED STATES DEPARTMENT  
OF DEFENSE; ROBERT M. GATES,  
Secretary of Defense;  
UNITED STATES DEPARTMENT  
OF THE ARMY, and JOHN McHUGH  
Secretary of the Army,  
Defendants.

**SUPPLEMENTAL DECLARATION OF DR. CYNTHIA A. CHAMBERS**

In accordance with 28 U.S.C. § 1746, I, Dr. Cynthia A. Chambers, make the following unsworn declaration, under penalty of perjury, pertinent to the above styled and numbered cause:

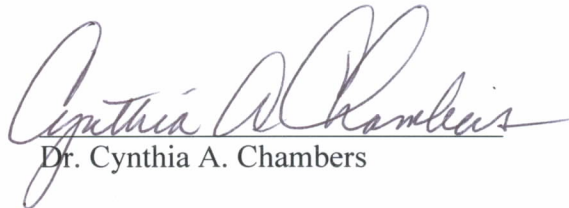
Dr. Cynthia A. Chambers declares as follows:

1. In my previous declaration, I interpreted Mr. Eakin’s request to encompass all 65,000 Individual Deceased Personnel Files (“IDPFs”) related to the Philippines. If Mr. Eakin is only requesting the IDPFs for service members from the POW camps in the Philippines, the number of civilians and military deceased is approximately 9,123.
2. The IDPFs are not separated by loss location. The IDPFs for all World War II are filed alphabetically in six separate accessions totaling 10,478 boxes. The IDPFs are not separated by geographic area or by missing/recovered.
3. A request for the IDPFs related to the POW camps would require time and research. Datasets created after the war may be compiled to derive a list of men who died while in prison camps in the Philippines, but research shows that these datasets must be refined by reviewing all of the IDPFs to verify an individual’s specific camp of loss. While the effort to construct an

initial rough list of men who died in a particular camp is minimal, the effort to refine and verify the list is extensive. Taking into account the general workload in our office, a historian dedicated to this effort would require approximately three years to pull, assess, and incorporate data from the IDPFs in question.

4. As noted in my previous declaration, Mr. Eakin's request for IDPFs is only one part of his overall request, which also requests X-Files. Without additional substantial resources, Mr. Eakin's request would detract from DPMO's worldwide mission of recovering WWII missing. Families of service members whose losses occurred outside the Philippines would have to wait. Mr. Eakin's request would hinder the Accounting Community efforts to find answers, and deny families of the missing efforts of the Accounting Community to find and return the loved ones, and prevent the public from benefitting from the historical research that would be suspended.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on this 24th day of May 2011.

  
Dr. Cynthia A. Chambers