



1 I, Andrew E. Carmichael, swear under penalty of perjury under the laws of the United  
2 States to the following:

3 1. I am a Trial Attorney at the United States Department of Justice and counsel of  
4 record for Defendants in this action. I submit this declaration in support of Defendants' Reply  
5 In Support of Their Motion for a Protective Order.

6 2. On June 4, 2018, I served on Plaintiffs' counsel a privilege log on behalf of the  
7 President and informed Plaintiffs' counsel that Defendants plan to supplement this privilege  
8 log.

9  
10 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is  
11 true and correct.

12  
13 EXECUTED this 13th day of June, 2018.

14 */s/ Andrew E. Carmichael*  
15 Andrew E. Carmichael  
16 Trial Attorney  
17 United States Department of Justice  
18 Civil Division, Federal Programs Branch  
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