

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

ACCURACY IN MEDIA, INC. et al.,)
)
 Plaintiffs,)
)
 v.)
)
 DEPARTMENT OF DEFENSE et al.,)
)
 Defendants.)

Case No. 14-1589 (EGS)

**DECLARATION OF ATTORNEY MEGAN A. CROWLEY IN SUPPORT OF
DEPARTMENT OF JUSTICE’S MEMORANDUM OF LAW IN OPPOSITION TO PLAINTIFFS’
MOTION FOR PARTIAL SUMMARY JUDGMENT**

I, Megan A. Crowley, do hereby declare:

1. I am a Trial Attorney in the Federal Programs Branch, Civil Division of the United States Department of Justice. I am lead counsel and assigned with representation of Defendants in this case.

2. Attached as Exhibit A is a true and correct copy of Plaintiffs’ FOIA request to the Federal Bureau of Investigation (“FBI”), dated February 21, 2014.

3. Attached as Exhibit B is a true and correct copy of the letter dated March 14, 2014, that the FBI sent to Plaintiffs’ counsel, in response to Plaintiffs’ FOIA request.

4. On March 2, 2015, Plaintiffs’ counsel requested production of FBI 302 Interview Reports from interviews FBI allegedly conducted with Mark Geist, Kris Paronto, and John Tiegen. Plaintiffs’ counsel informed me that Plaintiffs intended to file a motion for partial summary judgment to compel their disclosure, should the FBI withhold them under applicable FOIA exemptions. I informed Plaintiffs’ counsel that I believed that a separate motion for

summary judgment on these possible documents would be a waste of time for the Court and the parties, and urged Plaintiffs to wait to file one single motion for summary judgment on the entirety of their request to the FBI.

5. Attached as Exhibit C is a true and correct copy of the letter that I sent to Plaintiffs' counsel via email on April 21, 2015.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Washington, D.C. on June 8, 2015.

/s/ Megan A. Crowley
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