

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ROGER HALL, et al., :
 :
 Plaintiffs, :
 :
 v. : C. A. No. 04-0814 HHK
 :
 :
 CENTRAL INTELLIGENCE AGENCY, :
 :
 Defendant :

DECLARATION OF JAMES H. LESAR

I, James H. Lesar, declare and say as follows:

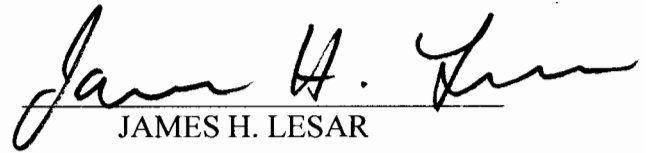
1. I represent plaintiffs Roger Hall and Studies Solutions Results, Inc. in this litigation. I have personal knowledge of the following facts.

2. In John Cummings v. Department of Defense, Civil Action No. 91-1736 (D.D.C.), I represented the plaintiff, John Cummings. During the course of that lawsuit, Cummings took the deposition of Terry Reed. An authentic copy of that deposition, minus the cover page, is attached to the Revised Hall Declaration as Exhibit 19.

3. In Allen v. Central Intelligence Agency, 636 F.2d 1287 (D.C.Cir.1980), in which I represented plaintiff-appellant Mark Allen, noted that Allen had “speculated in great detail as to the contents of the withheld document.” 636 F.2d 1299 n.47.

Subsequently, over a decade later, the contents of this document were released. They showed that Allen had been correct in his “spedculation.”

I declare under penalty of perjury that the foregoing is true and correct. Executed
this 11th day of August, 2008.


JAMES H. LESAR