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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

Edward Hasbrouck

Plaintiff,

vs.

U.S. Customs and Border
Protection

Defendant.

Case No. 3:10-cv-03793-RS

DECLARATION OF
ELIZABETH EDWARDS IN
SUPPORT OF PLAINTIFF'S
COMBINED CROSS-
MOTION FOR SUMMARY
JUDGMENT AND
OPPOSITION TO
DEFENDANT'S MOTION
FOR SUMMARY
JUDGMENT

Date: August 25, 2011

Time: ~~2:30 PM~~ 1:30 PM

Judge: The Hon. Richard
Seeborg

DECLARATION OF ELIZABETH EDWARDS

I, Elizabeth T. Edwards, declare as follows:

1. I am an attorney and law librarian, currently working as a temporary research librarian for the firm of Foster Pepper PLLC in Seattle, WA.

2. In June and July of 2007, I was a summer intern for First Amendment Project in Oakland, California. In that capacity, I assisted Edward Hasbrouck in making a Privacy Act request to U.S. Customs and Border Protection (CBP) for records pertaining to Mr. Hasbrouck in the ATS records system.

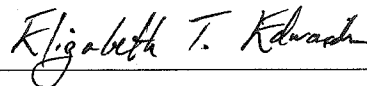
3. During that summer, Mr. Hasbrouck sent to me a signed and dated Privacy Act request and a signed release authorizing CBP to release responsive materials to James Harrison, a staff attorney at First Amendment Project. I have reviewed the exhibits attached to the Declaration of Edward Hasbrouck filed in support of his summary judgment motion and attest that Exhibits A and B attached thereto are true and correct copies of the request letter and release.

4. I placed the signed and dated Privacy Act request and the signed release in an envelope addressed to:

U.S. Customs and Border Protection
Office of Field Operations
Freedom of Information Act/Privacy Act, Room 5.5-C
1300 Pennsylvania Avenue, NW
Washington, D.C. 20229

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on June 21, 2011.



By: Elizabeth T. Edwards