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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

AYMAN LATIF, et al., <i>Plaintiffs,</i>	Case 3:10-cv-00750-BR
v. ERIC H. HOLDER, JR., et al., <i>Defendants.</i>	DECLARATION OF HUGH HANDEYSIDE IN SUPPORT OF PLAINTIFFS' COMBINED RENEWED MOTION FOR PARTIAL SUMMARY JUDGMENT

I, Hugh E. Handeyside, hereby declare and state as follows pursuant to 28 U.S.C. § 1746:

1. I am one of the attorneys representing the Plaintiffs in the above-captioned case. I make this declaration in support of Plaintiffs' Combined Renewed Motion for Partial Summary Judgment.

2. Attached hereto as Exhibit A is a true and correct copy of a document titled "March 2013 Watchlisting Guidance" that was leaked to the online publication *The Intercept* and posted at <https://firstlook.org/theintercept/document/2014/07/23/march-2013-watchlisting-guidance/> as of July 23, 2014.

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

Executed on April 17, 2015.



HUGH E. HANDEYSIDE

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing declaration was delivered to all counsel of record via the Court's ECF notification system.

s/ Hina Shamsi

Hina Shamsi