

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

AMERICAN CIVIL LIBERTIES UNION,
et al.,

Plaintiffs,

v.

CENTRAL INTELLIGENCE AGENCY,

Defendant.

No. 18-cv-2784 (CJN)

DECLARATION OF CHARLES HOGLE

I, Charles Hogle, pursuant to 28 U.S.C. § 1746, hereby declare and state under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

1. I am an attorney at the American Civil Liberties Union Foundation and counsel for Plaintiffs the American Civil Liberties Union and the American Civil Liberties Union Foundation in the above-numbered action.

2. I submit this declaration in support of Plaintiffs' Opposition to Defendant's Motion for Summary Judgment.

3. Attached hereto as Exhibit 1 is a true and correct copy of an email message from Dror Ladin, counsel for Plaintiffs, to Joshua Kolsky, counsel for Defendant.

4. The quoted terms in Exhibit 1 are the "keywords" referenced in paragraph 14 of the Declaration of Vanna Blaine, ECF No. 25-2.

5. Attached hereto as Exhibit 2 is a pair of tables reflecting Plaintiffs' review of Defendant's Vaughn index, ECF No. 24-4. These tables are organized as follows:

- a. Table 1: Exemptions claimed in Vaughn-index entries representing records released in part.
- b. Table 2: Exemptions claimed in Vaughn-index entries representing records withheld in full.

Dated: January 11, 2021
Philadelphia, PA

/s/ Charles Hogle

Charles Hogle
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