

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMERICAN CIVIL LIBERTIES UNION and
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION,

Plaintiffs,

v.

DEPARTMENT OF JUSTICE, including its
components the OFFICE OF LEGAL COUNSEL
and the OFFICE OF INFORMATION POLICY,
DEPARTMENT OF DEFENSE, DEPARTMENT
OF STATE, and CENTRAL INTELLIGENCE
AGENCY,

Defendants.

No. 15 Civ. 1954 (CM)

ECF CASE

SECOND DECLARATION OF MATTHEW SPURLOCK

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

I am an attorney at the American Civil Liberties Union Foundation and co-counsel for Plaintiffs in this litigation. Attached hereto are true and correct copies of the following:

Exhibit #	Short Title	Full Citation
Exhibit 51	Report on Associated Forces	DOD, Report on Associated Forces (July 2014)
Exhibit 52	Report on Process	DOD, Report on Process for Determining Targets of Lethal or Capture Operations (Mar. 6, 2014)

Exhibit #	Short Title	Full Citation
Exhibit 53	January 2014 Rizzo Book	John Rizzo, <i>Company Man: Thirty Years of Controversy and Crisis in the CIA</i> (2014)*
Exhibit 54	November 2015 Panetta Statement	Chris Whipple, ' <i>The Attacks Will Be Spectacular</i> ', Politico, Nov. 12, 2015

Date: December 1, 2015

Respectfully submitted,

/s/ Matthew Spurlock
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* Exh. 53 is additional material—the copyright page—from the source of Spurlock Decl. Exh. 35 (January 2014 Rizzo Book), ECF No. 34-35.