

I, William M. Simpich, declare:


1. I am an attorney licensed to practice in the state of California, the Northern District of California, the Central District of California, the Eastern District of California, and the United States Supreme Court.

2. During the last couple of weeks, Jim Lesar has asked me to research the vein of law regarding in camera submissions in the FOIA arena. There are a variety of approaches in this arena, and I have researched this area in previous civil rights cases.

3. I have a 92-year old client who has taken up a large portion of my caseload right now. I have a variety of cases, but she needs my special attention. She lost her home in foreclosure, but I managed to assist her in regaining possession while the underlying issues are litigated. I am taking special care to ensure that she survives this lawsuit.

4. Due to the press of business, I cannot turn around and provide Mr. Lesar with the immediate answers he is seeking. I have been able to advise him in various approaches and will continue to refine our approach. I need another thirty days to be able to wrap up this line of research.

I declare under penalty of perjury that the foregoing is true and correct and to the best of my personal knowledge. Executed on October 9, 2018, in Richmond, Contra Costa County, California.



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WILLIAM M. SIMPICH

EXHIBIT A