

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ROGER HALL, et al.,)
)
Plaintiffs,)
)
v.) Civil Action No. 04-814 (RCL)
)
CENTRAL INTELLIGENCE AGENCY,)
)
Defendant.)
_____)

DECLARATION OF JAMES H. LESAR

I, James H Lesar, declare and say as follows:

1. I hereby reaffirm the Statement of James H Lesar that was attached as a separate status report to the Joint Status Report, ECF 362, filed on March 29, 2021. There are additional reasons not set forth in the that Report which indicate the extraordinary difficulty of meeting proposed deadlines in this case, particularly the date for filing a properly supported motion for reconsideration.

2. Much of the work on the application for attorney fees already has been done in terms of documenting a large number of hours that have been worked by me. Most importantly, the CIA seems to be making a good faith effort to settle the case in line with this Court's prior rulings.

3. Nevertheless, the impact on a prompt settlement of the attorneys' fees issue is going to be quite substantial, with the likely result that in order to get

urgently funds as soon as possible, I may be forced to settle this case at far less than I otherwise would or be forced at great expense to litigate the attorney fees issue. On this later point, the most obvious sticking point will be the CIA's failure to abide by the enhanced Legal Services Index rate (LSI Matrix rate, which this Court has previously ruled is the governing precedent on the bona fide Laffey matrix issues.

4. The CIA has not yet responded to Plaintiff Hall's request for information of the precise LSI and updated US Attorney Fees rates that the CIA contends are the rates that should apply.

5. The matter of the fraudulent indictment of Julia Greenberg has an enormous impact both upon Hall's application for an award of attorney fees and a properly supported motion for reconsideration of this Court's dismissal of this case. For example, contrary to the representations of the counsel represented her at the March 22, 2021 hearing on her indictment, Ms. Greenberg's law practice was not limited to Immigration and Asylum law. To the contrary, over the last decade plus, she had worked for and with me on the following Civil Actions brought under the Freedom of Information Act (FOIA), Privacy Act (PA), and President John F. Kennedy Assassinations Records Act of 1992 (JFK Act or JFK Records Act). C.A. No. 87-3349, Carl Oglesby v. FBI et al; C.A. No. 02-06021, Wheeler v. FBI, DOJ; C.A. No. 03-0874, Lardner v. FBI, DOJ; C.A. No. 03-2545, Morley v. CIA;

C.A.04-0814, Hall v. CIA; C.A. No. 08-1252, Clemente v. FBI, DOJ; C.A. No. 09-932, Kisseloff v. FBI, et al., C.A. No. 09-932; C.A. No. 13-0108; C.A. No. 20-1527, Clemente v. FBI, DOJ. This list may not be exhaustive and does not include several appellate cases.

6. I am aware of a number of new cases which bear on the substantive and procedural issues which are germane to this Court's dismissal of this case. Because of globally important breaking news on Jeffrey Epstein and cohorts that have occurred this afternoon and tonight, I lack time to detail them even in summary form if I am to meet tonight's deadline. They do, of course, involve Exemption 1, Exemption 3, Exemption 5, Exemption 6, Exemption 7, and the Glomar defenses put forward in this case.

I certify under penalty of perjury that the foregoing is true and correct. I further certify that I am the person executing this declaration. Executed on March 30, 2021.

/s/ James H. Lesar