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UNITED STATES DISTRICT COURT		
SOUTHERN DISTRICT OF NEW YORK		
LANE DOE LANE DOE (MINOD)	-x	
JANE DOE, JANE ROE (MINOR),	·	
SUE DOE (MINOR), AND JAMES DOE (MINOR),	•	
DOE (MINOR),	•	
Plaintiffs,	•	ECF CASE
- 100000000	÷	
- V	:	05 Civ. 7939 (LTS)
	:	
CENTRAL INTELLIGENCE AGENCY,	:	
PORTER GOSS, [AGENCY NAME	:	
REDACTED], AND UNITED	:	
STATES OF AMERICA,	:	
	:	
Defendants.	:	
	- X	

## **DECLARATION OF SARAH S. NORMAND**

SARAH S. NORMAND, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am an Assistant United States Attorney in the office of Michael J. Garcia,

United States Attorney for the Southern District of New York, attorney for defendants the Central Intelligence Agency ("CIA"), Porter J. Goss, Director of the CIA, the United States of America, and a federal agency the identity of which is classified (collectively, the "Government") in the above-captioned action. I have been assigned to defend this matter, and am fully familiar with the facts pertaining to it. 2. I submit this declaration in support of the Government's assertion of the state secrets privilege and motion to dismiss this action. I make this declaration based upon my personal knowledge and information provided to me in the course of my official duties.

3. A true and correct copy of the redacted complaint filed by plaintiffs in this matter is attached hereto as Exhibit A.

4. Prior to filing their complaint, plaintiffs' counsel submitted an unredacted version of the complaint to the CIA for classification review. The CIA subsequently provided plaintiffs' counsel with the version that ultimately was filed, see Exhibit A, from which all classified information has been redacted.

5. A true and correct copy of the unclassified declaration of Porter J. Goss, director of the CIA, entitled "Formal Claim of State Secrets Privilege by Porter J. Goss, Director[,] Central Intelligence Agency," is attached hereto as Exhibit B.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York March 29, 2006

> s/ Sarah S. Normand SARAH S. NORMAND Assistant United States Attorney