

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

ELECTRONIC PRIVACY
INFORMATION CENTER

Plaintiff

v.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY

Defendant.

Case No. 1:09-cv-02084(RMU)

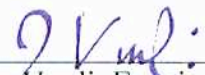
AFFIDAVIT IN SUPPORT OF DEFAULT

I hereby certify under penalty of perjury, this 8th day of January 2010, that I am the attorney of record for the plaintiff in the above-entitled case; that the Defendant, the United States Department of Homeland Security, was properly served with the Complaint and all other required papers on November 12, 2009, via certified mail pursuant to Fed. R. Civ. P. 4(i)(2).

I further certify under penalty of perjury that no appearance has been entered by said defendant in this case; no pleading has been filed and none served upon the attorney for the plaintiff; no extension has been given and the time for filing has expired; and that the Defendant is neither an infant nor an incompetent person.

The Clerk is requested to enter a Default against said defendant.

Respectfully submitted,



John Verdi, Esquire (DC Bar #495764)
Marc Rotenberg, Esquire (DC Bar #422825)
ELECTRONIC PRIVACY INFORMATION
CENTER
1718 Connecticut Ave. NW
Suite 200
Washington, DC 20009
(202) 483-1140 (telephone)
(202) 483-1248 (facsimile)

495764

Bar ID Number

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 8th day of January, 2010, a true copy of the foregoing

Affidavit in Support of Default was served via U.S. Mail on:

Eric Holder
Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Ave., NW
Washington, DC 20530

The Office of General Counsel
U.S. Department of Homeland Security
Washington, DC 20528

Channing D. Phillips
U.S. Attorney for the District of Columbia
555 4th Street, NW
Washington, DC 20530



John Verdi