

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

VALENCIA M. MCCLATCHEY,)	
)	
Plaintiff,)	
)	Civil Action No. 05-145J
v.)	
)	
THE ASSOCIATED PRESS,)	JURY TRIAL DEMANDED
)	
Defendant.)	
)	

DECLARATION OF GAYLE C. SPROUL

I, Gayle C. Sproul, hereby declare, under penalty of perjury as follows:

1. I am an attorney admitted to and in good standing in the bar of this Court. My Pennsylvania attorney identification number is 38833.
2. I am a partner in the law firm of Levine Sullivan Koch & Schulz, L.L.P., resident in the firm's Philadelphia, Pennsylvania office. Robert Penchina and I represent defendant The Associated Press in the above-captioned matter.
3. Michael Berry is an associate of Levine Sullivan Koch & Schulz, L.L.P., resident in the firm's Philadelphia, Pennsylvania office. Mr. Berry is admitted to and in good standing in the bars of the following state and federal courts: the Courts of the Commonwealth of Pennsylvania, the United States Courts of Appeal for the Third and Ninth Circuits, and the United States District Courts for the Eastern and Middle Districts of Pennsylvania.
4. Defendant anticipates that Mr. Berry will play an active role with Mr. Penchina and me in this litigation.

Pursuant to 18 U S C. § 1746, I declare under penalty of perjury that the foregoing is true and correct

Executed on this 7th day of March, 2006.

/s/ Gayle C. Sproul

Gayle C. Sproul