

**IN THE U.S. DEPARTMENT OF LABOR
OFFICE OF ADMINISTRATIVE LAW JUDGES**

COLLEEN A. GRAHAM,

Case No. 2019-SOX-00040

Complainant,

**DECLARATION OF MARYBETH
SHREINER**

v.

**CREDIT SUISSE SECURITIES, ET AL.,
Respondents.**

I, MaryBeth Shreiner, declare as follows:

1. I am an associate at the law firm Cooley LLP, counsel to Signac LLC (“Signac”) and respectfully submit this Declaration in support of Respondent Signac’s Opposition to Graham’s Motion to Compel and For Leave to Amend, and Cross-Motion to Extend Signac’s Time to Respond. I have personal knowledge of the facts set forth herein.

2. On January 31, 2018, I sent to Complainant’s counsel an e-mail attaching a letter regarding Signac’s production of documents in the JAMS arbitration captioned *Graham, et al. vs. Palantir Technologies Inc., et al.*, JAMS No. 1425025009. A copy of this e-mail correspondence is annexed hereto as Exhibit 1.

3. After sending the e-mail annexed hereto as Exhibit 1, on January 31, 2018 I sent a second e-mail to Complainant’s counsel producing documents on behalf of Signac through a file transfer site which contained 7,647 documents, comprised of 52,882 pages Bates labeled SI_00000001 - SI_00052882. A copy of this e-mail correspondence is annexed hereto as Exhibit

2.

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

Dated: May 1, 2020
Arlington, Virginia

/s/ MaryBeth Shreiner
MaryBeth Shreiner
COOLEY LLP
Reston Town Center
11951 Freedom Drive
Reston, VA 20190-5640
Telephone: (703) 456-8169
mshreiner@cooley.com

225160044

EXHIBIT 1

Lockinger, Joseph D

From: Shreiner, MaryBeth
Sent: Wednesday, January 31, 2018 4:26 PM
To: rk@kzlaw.net
Cc: Fulton, Jim; dg@kzlaw.net
Subject: Signac Production
Attachments: 2018.01.31 - Letter to Robert Kraus Esq_.pdf

Robert,

Please see the attached letter regarding Signac's production of documents.

I will send the link and login info in an email to follow. The Signac zip file also has a password: #=JUsp8feb6v

Best regards,
MaryBeth

MaryBeth W. Shreiner

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1299 Pennsylvania Avenue, NW • Suite 700
(enter from 12th and E Streets)
Washington, DC 20004-2400
Direct: +1 202 728 7038 • Fax: +1 202 842 7899
Email: mshreiner@cooley.com
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MaryBeth W. Shreiner
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Via Email

January 31, 2018

Robert Kraus, Esq.
Kraus & Zuchlewski LLP
One Grand Central Place
60 East 42nd Street
New York, NY 10165

Re: *Graham, et al. vs. Palantir Technologies Inc., et al.*, JAMS No. 1425025009

Dear Robert:

Pursuant to the Stipulated Protective Order, we write to inform you that, in accordance with Section 14.7 of the Second Amended and Restated Limited Liability Company Agreement of Signac, LLC, and in response to Claimant's request of December 22, 2017, Respondent Signac, LLC ("Signac") is providing Claimant with "copies of all relevant documents" responsive to Claimant's request and proportional to the needs of the case that could be located upon a reasonable search by January 31, 2018. Please be advised that Signac's production is subject to the following limitations:

- Signac is not producing documents that are protected from disclosure by the attorney-client privilege, joint-defense privilege, the work-product doctrine, or any other applicable privilege or immunity.
- Signac reserves the right to demand the return of any privileged documents inadvertently produced.

Sincerely,



MaryBeth W. Shreiner

Cc: J. Fulton, Esq.
D. Gustafson, Esq.

EXHIBIT 2

Lockinger, Joseph D

From: Shreiner, MaryBeth
Sent: Wednesday, January 31, 2018 4:27 PM
To: rk@kzlaw.net
Cc: Fulton, Jim; dg@kzlaw.net
Subject: Signac Production

Robert,

To follow my previous email, here is the link to Signac's production of documents: <https://ftp.discovia.com>

Here is your login information:

Username: Kraus_Zuchlewski

Password:

Best regards,
MaryBeth

MaryBeth W. Shreiner

Cooley LLP

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(enter from 12th and E Streets)

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