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6 AMERICAN CIVIL LIBERTIES  
UNION OF NORTHERN CALIFORNIA

7 SUPERIOR COURT OF CALIFORNIA

8 COUNTY OF SAN FRANCISCO

9 UNLIMITED JURISDICTION

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11 AMERICAN CIVIL LIBERTIES UNION OF )  
NORTHERN CALIFORNIA, )

No. CPF-10-510882

) DECLARATION OF NISHAN  
) BHAUMIK

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v.

15 CALIFORNIA DEPARTMENT OF )  
CORRECTIONS AND REHABILITATION )

Department: Dept. 302

Hrg. Date: Tuesday, Dec. 14, 2010

Respondent.

Hrg. Time: 9:30 am

21 I, Nishan Bhaumik, declare as follows:

22 1. I am a litigation assistant with the American Civil Liberties Union Foundation of  
Northern California.

23 2. On December 10, 2010, I reviewed the approximately 980 pages of documents released  
24 by the CDCR in this matter to see how many of them contain redactions.

25 3. I determined that approximately 201 pages of the records consist of documents published  
26 by the federal government, including three copies of the federal DEA Practitioners Manual and a  
27 number of blank forms relating to federal drug law.

28 4. Of the approximately 780 remaining pages, all but about 115 pages were redacted, some

1 quite heavily.

2 I declare under penalty of perjury under the laws of the State of California that the  
3 foregoing is true and correct.

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Dated: December 12, 2010

  
Nishan Bhaumik