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14 **UNITED STATES DISTRICT COURT**  
15 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
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17 THE MARY FERRELL FOUNDATION,  
18 INC.; JOSIAH THOMPSON; and GARY  
19 AGUILAR,

20 Plaintiffs,

21 v.

22 JOSEPH R. BIDEN, in his official capacity as  
23 President of the United States; and  
24 NATIONAL ARCHIVES AND RECORDS  
25 ADMINISTRATION,

26 Defendants.  
27  
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No. 3:22-cv-06176-RS

DECLARATION OF LAWRENCE  
SCHNAPF

Date: Nov. 30, 2023  
Dept: Hon. Richard Seeborg  
Time: 1:30 pm

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1. I am Lawrence P. Schnapf. My residence is 55 E.87<sup>th</sup> Street, #8B/8C, New York, New York 10128. I am an attorney admitted to practice in New York and New Jersey, and was admitted pro hac vice to the United States District Court for the Northern District of California to serve as co-counsel for the plaintiffs in this case.
2. I am the plaintiff in SCHNAPF v National Archives and Records Administration, 1:21-cv-02816-TJK (D.D.C.) where i sought all correspondence including memos and emails in connection with the executive orders of President Trump issued on October 26, 2017 and April 26, 2018 postponing the release of assassination records that were to be released on October 26, 2017 pursuant to the President John F. Kennedy Assassination Records Collection Act (“JFK Act”)
3. After the Defendant NARA filed its answer, the parties filed a joint report indicating that NARA had identified approximately 1300 response documents and that the parties had agreed to a processing schedule.
4. The Defendant NARA completed its production in ten batches of records. The August 21, 2017 memorandum from William J. Bosanko to John P. Fitzpatrick, Senior Director for Records, Access and Information Security Management, National Security Council, "Subject: FBI Proposed Postponements of JFK Assassination Records" was one of the documents produced by Defendant NARA ("Bosanko Memo").
5. I certify that the Bosanko Memo included in the Plaintiffs' Motion for Injunctive Relief, Declaratory Relief or Mandamus is a true and correct copy produced by Defendant NARA.

I declare under penalty of perjury that the foregoing is true and correct and of my own knowledge or based on information and belief and I believe that all such matters are true and correct. Executed on October 26, 2023, in New York City, New York.

\_\_\_\_\_/s/ Lawrence P. Schnapf\_\_\_\_\_  
Lawrence P. Schnapf