

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

FAIRHOLME FUNDS, INC., <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	No. 13-465C
v.)	(Judge Sweeney)
)	
THE UNITED STATES,)	
)	
Defendant.)	

**NOTICE OF FILING OF APPLICATIONS OF
STACEY K. GRIGSBY, ERIC L. ZAGAR, AND JOSHUA B. KAPLAN
FOR ACCESS TO PROTECTED INFORMATION**

Pursuant to Paragraph 7 of the Protective Order (Doc. 73) issued by the Court on July 16, 2014, Plaintiffs respectfully file the attached applications of Stacey K. Grigsby, Eric L. Zagar, and Joshua B. Kaplan for access to Protected Information. In accordance with the procedures established under Paragraph 7 of the Protective Order, counsel for the parties have consulted with each other regarding these applications, and neither opposes the applicants' access to Protected Information.

Date: July 13, 2015

Respectfully submitted,

Of counsel:
Vincent J. Colatristano
David H. Thompson
Peter A. Patterson
Brian W. Barnes
COOPER & KIRK, PLLC
1523 New Hampshire Avenue, N.W.
Washington, D.C. 20036
(202) 220-9600
(202) 220-9601 (fax)

s/ Charles J. Cooper
Charles J. Cooper
Counsel of Record
COOPER & KIRK, PLLC
1523 New Hampshire Avenue, N.W.
Washington, D.C. 20036
(202) 220-9600
(202) 220-9601 (fax)
ccooper@cooperkirk.com

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served upon all counsel of record on this 13th day of July, 2015, via the Court's Electronic Case Filing system.

s/ Charles J. Cooper
Charles J. Cooper

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)	
Plaintiffs,)	
)	No. 13-465C
v.)	(Judge Sweeney)
)	
THE UNITED STATES,)	
)	
Defendant.)	

DECLARATION OF STACEY K. GRIGSBY

I hereby certify that I have carefully reviewed and am fully familiar with the provisions of the Protective Order dated July 16, 2014, entered and filed of record in the above-captioned litigation ("Protective Order").

I certify that I am eligible to have access to Confidential Material, pursuant to this Court's Order of July 10, 2015 entered in *Cacciapalle v. United States, et al.*, No. 13-466 and paragraphs 4 and 7 of the Protective Order. As a condition precedent to my examination of any Protected Information pursuant to the Protective Order, or any information contained in said material, I hereby agree that the Protective Order and any amendments thereto shall be deemed directed to and shall bind me, and that I shall observe and comply with all provisions of the Protective Order.

Stacey Grigsby
SIGNATURE

Stacey K. Grigsby
NAME (PRINTED)

5301 Wisconsin Ave., NW, Washington DC 20015
BUSINESS ADDRESS

Boies, Schiller & Flexner LLP
CURRENT EMPLOYER

Counsel
CURRENT OCCUPATION OR JOB DESCRIPTION

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

FAIRHOLME FUNDS, INC., <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	No. 13-465C
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)	
Defendant.)	

DECLARATION OF ERIC L. ZAGAR

I hereby certify that I have carefully reviewed and am fully familiar with the provisions of the Protective Order dated July 16, 2014, entered and filed of record in the above-captioned litigation ("Protective Order").

I certify that I am eligible to have access to Confidential Material, pursuant to this Court's Order of July 10, 2015 entered in *Cacciapalle v. United States, et al.*, No. 13-466 and paragraphs 4 and 7 of the Protective Order. As a condition precedent to my examination of any Protected Information pursuant to the Protective Order, or any information contained in said material, I hereby agree that the Protective Order and any amendments thereto shall be deemed directed to and shall bind me, and that I shall observe and comply with all provisions of the Protective Order.



SIGNATURE

Eric L. Zagar
NAME (PRINTED)

280 King of Prussia Road, Radnor, PA 19087
BUSINESS ADDRESS

Kessler Topaz Meltzer & Check, LLP
CURRENT EMPLOYER

Counsel
CURRENT OCCUPATION OR JOB DESCRIPTION

ATTACHMENT A

In the United States Court of Federal Claims


No. 13-465C

 FAIRHOLME FUNDS, INC. et al., *
 *
 Plaintiffs, *
 *
 v. *
 *
 THE UNITED STATES, *
 *
 Defendant. *

DECLARATION OF Joshua B. Kaplan

I hereby certify that I have carefully reviewed and am fully familiar with the provisions of the Protective Order dated 7/16/14 entered and filed of record in the above-captioned litigation ("Protective Order").

I certify that I am eligible to have access to Confidential Material, pursuant to the Court's July 10, 2015 Order. As a condition precedent to my examination of any Protected Information pursuant to the Protective Order, or any information contained in said material, I hereby agree that the Protective Order and any amendments thereto shall be deemed directed to and shall bind me, and that I shall observe and comply with all provisions of the Protective Order.



 SIGNATURE

Joshua B. Kaplan

 NAME (PRINTED)

1818 Market Street, Suite 2500, Phila., PA 19103

 BUSINESS ADDRESS

Spector Roseman Kodroff & Willis, P.C.

 CURRENT EMPLOYER

Associate

 CURRENT OCCUPATION OR JOB DESCRIPTION