

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
WESTERN DIVISION**

UNITED STATES OF AMERICA

v.

Case No.: 3:07CR192-NBB-SAA

RICHARD F. SCRUGGS,  
DAVID ZACHARY SCRUGGS,  
SIDNEY A. BACKSTROM,

**DECLARATION OF WARREN BRAUNIG IN SUPPORT OF DEFENDANTS' MOTION  
FOR RECONSIDERATION OF ANONYMOUS JURY ORDER, OR ALTERNATIVELY  
FOR A SUPPLEMENTAL JURY QUESTIONNAIRE; FOR TRANSFER OF VENUE;  
AND FOR EXPANDED VOIR DIRE PROCEDURES**

I, WARREN BRAUNIG, declare as follows:

I am an attorney in the law firm of Keker & Van Nest, LLP, attorneys for Richard F. Scruggs in the above-captioned case. Except where specifically stated below, I have knowledge of the facts set forth herein and if called to testify as a witness thereto could do so competently under oath.

1. Attached hereto as **Exhibit 1** is a true and correct copy of a proposed Supplemental Juror Questionnaire.
2. Attached hereto as **Exhibit 2** are true and correct copies of the relevant excerpts from *United States v. Edwards, et al.*, 119 F. Supp. 2d 589 (MD. La. 2000).
3. Attached hereto as **Exhibit 3** are true and correct copies of the relevant excerpts of The Clarion-Ledger Market Perspective 2006.
4. Attached hereto as **Exhibit 4** are true and correct copies of the relevant excerpts from the Northeast Mississippi Daily Journal (“Daily Journal”) Advertising Policy, dated January 1, 2008.

5. Attached hereto as **Exhibit 5** are true and correct copies of the relevant excerpts from The Oxford Eagle Advertising 2008 Rates.

6. Attached hereto as **Exhibit 6** are true and correct copies of the relevant articles which ran in the Clarion-Ledger between February 11, 2008 and March 10, 2008.

7. Attached hereto as **Exhibit 7** are true and correct copies of the relevant articles which ran in the Daily Journal between February 11, 2008 and March 10, 2008.

8. Attached hereto as **Exhibit 8** are true and correct copies of the relevant articles which ran in the Oxford Eagle between February 11, 2008 and March 10, 2008.

9. Attached hereto as **Exhibit 9** are true and correct copies of the relevant articles which ran in the Greenwood Commonweath between February 11, 2008 and March 10, 2008.

10. Attached hereto as **Exhibit 10** are true and correct copies of the relevant articles which ran in the (Biloxi) Sun Herald between February 11, 2008 and March 10, 2008.

11. Attached hereto as **Exhibit 11** is a true and correct copy of an article from The Democrat, “Poster Child for Greed”, dated February 26, 2008

12. Attached hereto as **Exhibit 12** is a true and correct copy of an article and postings from the Clarion-Ledger, “Feds are investigating Scruggs’ link to Hinds County judge”, dated February 21, 2008.

13. Attached hereto as **Exhibit 13** is a true and correct copy of an article and postings from the Clarion-Ledger, “AG pulled into Scruggs fray”, dated February 27, 2008.

14. Attached hereto as **Exhibit 14** is a true and correct copy of the internet blog from LegalNewline.com, “Blogsphere becomes authority”, dated February 14, 2008.

15. Attached hereto as **Exhibit 15** are true and correct copies of the relevant excerpts from the Motion Hearing transcript, dated February 20, 2008

16. Attached hereto as **Exhibit 16** are true and correct copies of the relevant excerpts from the Motion Hearing transcript, dated February 21, 2008

17. Attached hereto as **Exhibit 17** is a true and correct copy of an article and postings from [www.folo.us](http://www.folo.us) internet blog, dated March 1, 2008.

18. Attached hereto as **Exhibit 18** are true and correct copies of the relevant articles which ran in the New Orleans Times Picayune between February 11, 2008 and March 10, 2008.

19. Attached hereto as **Exhibit 19** are true and correct copies of the relevant articles which ran in the Memphis Commerical Appeal between February 11, 2008 and March 10, 2008.

20. Attached hereto as **Exhibit 20** are true and correct copies of the relevant articles which ran in the Houston Chronicle between February 11, 2008 and March 10, 2008.

21. Attached hereto as **Exhibit 21** is a true and correct copy of an article and postings from the Clarion-Ledger, "Judiciary internal housecleaning", dated March 2, 2008.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 12th day of March, 2008 in San Francisco, California.

/s/ Warren Braunig  
WARREN BRAUNIG

**CERTIFICATE OF SERVICE**

I, WARREN BRAUNIG, do hereby certify that I have electronically filed the foregoing **Declaration Of Warren Braunig In Support Of Defendants' Motion For Reconsideration Of Anonymous Jury Order, Or Alternatively For A Supplemental Jury Questionnaire; For Transfer Of Venue; And For Expanded Voir Dire Procedures** with the Clerk of the Court using the ECF system, which sent notification for such filing to Thomas W. Dawson, Assistant United States Attorney, Robert H. Norman, Assistant United States Attorney, David Anthony Sanders, Assistant United States Attorney, Frank W. Trapp, J. Rhea Tannehill, Jr., Nathan F. Garrett, and Todd P. Graves.

This, the 12 day of March, 2008.

/s/ Warren Braunig  
WARREN BRAUNIG