

**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 BROOK DOOLEY IN SUPPORT OF DEFENDANTS' SECOND
MOTION FOR DISCOVERY AND MEMORANDUM OF POINTS AND AUTHORITIES
IN SUPPORT THEREOF**

I, BROOK DOOLEY, declare as follows:

I am an associate 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 A** is a true and correct copy of a letter to David Sanders from me dated February 28, 2008.
2. Attached hereto as **Exhibit B** is a true and correct copy of the Federal Bureau of Investigation ("FBI") Form 302 by Agent William Delaney, dated May 10, 2007.
3. Attached hereto as **Exhibit C** is a true and correct copy of the relevant excerpts from the Hearing held on February 20, 2008.
4. Attached hereto as **Exhibit D** is a true and correct copy of the FBI Form 302 by Agent William Delaney, dated May 25, 2007.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 11th day of March, 2008 in San Francisco, California.

/s/ Brook Dooley
Brook Dooley

CERTIFICATE OF SERVICE

I, Brook Dooley, do hereby certify that I have electronically filed the foregoing **Declaration of Brook Dooley in Support of Defendants' Second Motion for Discovery and Memorandum of Points and Authorities In Support Thereof** 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., Todd P. Graves and Nathan F. Garrett.

This, the 11th day of March, 2008.

/s/ Brook Dooley
Brook Dooley