

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Adam Steele, Brittany Montrois, and
Joseph Henschman, on behalf of
themselves and all others similarly
situated,
Plaintiffs,

v.

United States of America,
Defendant.

Civil Action No.: 1:14-cv-01523-RCL

**DECLARATION OF MEGHAN S. B. OLIVER IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO THE UNITED STATES' MOTION FOR PARTIAL
SUMMARY JUDGMENT**

I, Meghan S. B. Oliver, being of full age, certify and state as follows:

1. I am an attorney at law at the law firm of Motley Rice LLC admitted to practice in the State of South Carolina, the Commonwealth of Virginia, and the District of Columbia.
2. I submit this declaration and the attached Exhibits in support of Plaintiffs' Opposition to the United States' Motion for Partial Summary Judgment.
3. For ease of the Court's reference, and unless otherwise indicated, all highlighting in the Exhibits was added by Plaintiffs in yellow.
4. Attached hereto are true and correct copies of the following:

Exhibit Letter	Description
Exhibit BV	Nov. 2011, Compliance and Enforcement Employee Desk Guide, Bates BAH_0002270.0001-0002270.0020 , produced by nonparty Booz Allen Hamilton in this Action.
Exhibit BW	Aug. 2012, excerpts of RPO overview document, Bates BAH_0000406.0001, 0000406.0050-0000406.0055, 0000406.0132-0000406.139 , produced by nonparty Booz Allen Hamilton in this Action. Exhibit BW is an excerpt of the document previously marked as Plaintiffs' Exhibit 272 at deposition. Booz Allen Hamilton initially designated this document as confidential, but has since withdrawn the designation.

Exhibit BX	Aug. 5, 2010, email and attachment, User Fee Estimates, Bates USA-0029561-0029572 , produced by the United States in this Action, and previously marked as Plaintiffs' Exhibit 014 at deposition.
Exhibit BY	Apr. 30, 2010, email, Bates BAH_0002668.0001 , produced by nonparty Booz Allen Hamilton in this Action.
Exhibit BZ	May 3, 2010, email, Bates USA-0035819-0035820 , produced by the United States in this Action, and previously marked as Plaintiffs' Exhibit 235 at deposition.
Exhibit CA	July 19, 2016, excerpt of Internal Revenue Manual 1.35.19, Bates USA-0034811, 0034820-0034821 , produced by the United States in this Action.
Exhibit CB	Aug. 16, 2010, meeting minutes, Bates USA-0009018-0009020 , produced by the United States in this Action. The United States initially designated this document as confidential, but has since withdrawn the designation.
Exhibit CC	June 13, 2013, Memorandum for Chief Financial Officer, Bates USA-0034630-0034631 , produced by the United States in this Action, and previously marked as Plaintiffs' Exhibit 209 at deposition.
Exhibit CD	June 24, 2010, RPO organizational overview PowerPoint, Bates BAH_0000704.0001-000704.0012 , produced by nonparty Booz Allen Hamilton in this Action, and previously marked as Plaintiffs' Exhibit 248 at deposition. Booz Allen Hamilton initially designated this document as confidential, but has since withdrawn the designation.
Exhibit CE	Aug. 1, 2016, Accenture contract, TIRNO-11-D-00007 Task Order 13, Bates USA-0020897-0020914 , produced by the United States in this Action, and previously marked as Plaintiffs' Exhibit 144 at deposition. [Sealed]
Exhibit CF	Dec. 21, 2012, email, Bates Montrois000010 , produced by Plaintiffs in this Action. [Sealed in part]
Exhibit CG	Jan. 20, 2015, Letter 4644, Bates Steele000073-000074 , produced by Plaintiffs in this Action. [Sealed in part]
Exhibit CH	Jan. 14, 2012, PTIN Deficiency Letter, Bates Steele000009-000010 , produced by Plaintiffs in this Action. [Sealed in part]
Exhibit CI	Dec. 11, 2012, excerpt of contract analysis, Bates AFS_00008724-00008725 , produced by nonparty Accenture Federal Services in this Action. [Sealed]
Exhibit CJ	Apr. 15, 2011, Accenture contract, TIRNO-10-C-00022 Modification 3, Bates USA-0020666-0020674 , produced by the United States in this Action, and previously marked as Plaintiffs' Exhibit 075 at deposition. [Sealed]
Exhibit CK	Dec. 8, 2010, Accenture contract, TIRNO-10-C-00022 Modification 2, Bates AFS_00015909-00015910 , produced by nonparty Accenture Federal Services in this Action. Accenture Federal Services initially designated this document as confidential, but has since withdrawn the designation.

Exhibit CL	Transcript excerpt of the Deposition of Former RPO Director, David Williams , taken on Dec. 16, 2021 in this Action.
Exhibit CM	Transcript excerpt of the 30(b)(6) Deposition of RPO Director, Carol Campbell , taken on Nov. 16, 2021 in this Action.
Exhibit CN	Oct. 2014, Metrics Report, Bates USA-0001549 , produced in Excel format by the United States in this Action, and previously marked as Plaintiffs' Exhibit 035 at deposition.
Exhibit CO	Transcript excerpt of the Deposition of Former RPO Compliance Director, Diann Wensing , taken on June 16, 2021 in this Action.
Exhibit CP	Transcript excerpt of the Deposition of RPO Strategy and Finance Budget Analyst Frontline Manager, Christopher "Kreg" Kurtz , taken on Oct. 28, 2021 in this Action
Exhibit CQ	Mar. 3, 2015, email and attachment, call log, Bates USA-0025099-0025101 , produced in Excel format by the United States in this Action, and previously marked as Plaintiffs' Exhibit 178 at deposition.

I hereby certify under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge.

Executed this 12th day of May, 2022

/s/ Meghan S. B. Oliver
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CERTIFICATE OF SERVICE

I hereby certify that on May 12, 2022 I electronically filed the Declaration of Meghan S. B. Oliver in Support of Plaintiffs' Opposition to the United States' Motion for Partial Summary Judgment through this Court's CM/ECF system. I understand that notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

Dated: May 12, 2022

/s/ William H. Narwold
William H. Narwold