UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MIKHAIL FRIDMAN, PETR AVEN, and GERMAN KHAN, *Plaintiffs,* v. BEAN LLC (a/k/a FUSION GPS) and GLENN SIMPSON, *Defendants*.	)))))))))))	Case No. 1:17-cv-02041 (RJL)

DECLARATION OF ALAN S. LEWIS
IN OPPOSITION TO DEFENDANTS' MOTION TO COMPEL PLAINTIFFS'
PRODUCTION OF DOCUMENTS

I, Alan S. Lewis, declare under penalty of perjury as follows:

1. I am an attorney duly licensed to practice law in this Court. I am a partner at the law firm of Carter Ledyard & Milburn LLP, and represent Plaintiffs Mikhail Fridman, Petr Aven, and German Kahn, in the above-captioned case.

2. This Declaration is submitted in support of Plaintiffs' opposition to Defendants' motion to compel production of documents filed August 14, 2020 (Dkt. 94). I am fully familiar with the facts and circumstances of this case.

3. Annexed hereto as **Exhibit 1** is a true and correct copy of the pre-2016 documents Plaintiffs produced as PDDC00008302, PDDC00008304, and PDDC00008316.

4. Annexed hereto as **Exhibit 2** is a true and correct copy of documents produced and bates stamped DEFS0011790-92 by Defendants, except that they have been converted from Excel to PDF format for the purposes of filing.

5. Annexed hereto as **Exhibit 3** is a true and correct excerpt of Crime in Progress: The Secret History of the Trump-Russia Investigation, written by Glenn R. Simpson and Peter Fritsch.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 11, 2020

/s/ Alan S. Lewis

Alan S. Lewis