

IN THE 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.

Civil Action No. 1:17-2041-RJL

DECLARATION OF THOMAS A. CLARE, P.C. IN SUPPORT OF
PLAINTIFFS' MEMORANDUM IN OPPOSITION TO DEFENDANTS'
MOTION FOR PARTIAL SUMMARY JUDGMENT
ON THE ISSUE OF PLAINTIFFS AS PUBLIC FIGURES

I, Thomas A. Clare, P.C., declare as follows:

1. I am an attorney at law in good standing and licensed to practice in the District of Columbia (D.C. Bar No. 461964). I am a partner of the law firm Clare Locke LLP, counsel for Plaintiffs Mikhail Fridman, Petr Aven, and German Khan. I submit this Declaration in support of Plaintiffs' Memorandum in Opposition to Defendants' Motion for Partial Summary Judgment on the Issue of Plaintiffs as Public Figures. Unless otherwise stated, I have personal knowledge of the facts set forth in this declaration and, if called as a witness, I could and would testify under oath competently thereto.

2. Attached hereto as Exhibit 1 is a true and correct copy of Defendants' First Requests for Production of Documents, served on October 11, 2019.

3. Attached hereto as Exhibit 2 is a true and correct copy of Defendants' First Set of Interrogatories to Plaintiffs, served on October 11, 2019.

4. Attached hereto as **Exhibit 3** is a true and correct copy of Defendants' Requests for Admission to Plaintiff Mikhail Fridman, dated June 24, 2020.

5. Attached hereto as **Exhibit 4** is a true and correct copy of Defendants' Requests for Admission to Petr Aven, dated June 24, 2020.

6. Attached hereto as **Exhibit 5** is a true and correct copy of Defendants' Requests for Admission to German Khan, dated June 24, 2020.

7. Attached hereto as **Exhibit 6** is an excerpt of a transcript of the deposition of Plaintiff Petr Aven, which was taken on December 9, 2020.

8. Attached hereto as **Exhibit 7** is an excerpt of a transcript of the deposition of Plaintiff Mikhail Fridman, which was taken on November 17, 2020.

9. Attached hereto as **Exhibit 8** is an email communication from Joshua A. Levy to Alan S. Lewis, dated February 19, 2021.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct. Executed this 5th day of March, 2021, at the City of Alexandria, Commonwealth of Virginia.

/s/ Thomas A. Clare, P.C.
Thomas A. Clare, P.C.