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10 Attorneys for Plaintiff

11 UNITED STATES DISTRICT COURT  
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA

13 TERRENCE DAVIS, on behalf of himself )  
14 and all others similarly situated, )

15 Plaintiffs, )

16 v. )

17 MICHAEL J. ASTRUE, Commissioner of the )  
18 Social Security Administration, )

19 Defendant )

CIVIL ACTION Nos.: 3:06-CV-6108 MHP  
& 3:09-CV-980 MHP

SUPPLEMENTAL DECLARATION OF  
STEVEN BRUCE IN SUPPORT OF  
PLAINTIFFS' JOINT MOTIONS FOR  
PARTIAL SUMMARY JUDGMENT

20 JOHN DOE, )

21 Plaintiff, )

22 v. )

23 MICHAEL J. ASTRUE, Commissioner of the )  
24 Social Security Administration, )

Defendant )

25 I, Steven Bruce, declare as follows:

26 1. I am an attorney of record in the above-captioned cases. Except where otherwise  
27 indicated, the following statements are based on personal and first-hand knowledge.  
28

1           2. Plaintiffs' Ex. D is a true and correct copy of Defendant's Supplemental Responses to  
2 Plaintiff Davis' First Set of Interrogatories received on April 19, 2010.

3           3. Plaintiffs' Exs. E-H, J, U, W-X, BB-EE, GG-LL, OO, BBB, and III are true and  
4 correct copies of documents produced by Defendant in response to Plaintiff Davis' First Set of  
5 Request for Documents.

6           4. Plaintiffs' Ex. I is a true and correct copy of a document produced by Plaintiff Davis  
7 in response to Defendant's First Set of Request for Documents and is a true and correct copy of a  
8 document that SSA provided to Plaintiff Davis in the course of his SSA appeal(s).

9           5. Plaintiffs' Ex. K is a true and correct copy of a letter obtained by Plaintiff Davis  
10 directly from Edward Lee, M.D.

11           6. Plaintiffs' Exs. L-S and FF are true and correct copies of documents produced by  
12 Plaintiff Doe in response to Defendant's First Set of Request for Documents and are true and  
13 correct copies of documents that SSA provided to Plaintiff Doe in the course of his SSA  
14 appeal(s).

15           7. Plaintiffs' Exs. Z-AA, MM-NN, PP-VV, YY, FFF, and JJJ are true and correct copies  
16 of documents produced by Defendant in response to Plaintiff Doe's First Set of Request for  
17 Documents.

18           8. Plaintiffs' Ex. XX is a true and correct copy of Defendant's Supplemental Responses  
19 to Plaintiff Doe's First Set of Interrogatories received on April 19, 2010.

20           9. Plaintiffs' Ex. ZZ is a true and correct copy of a letter response from SSA regarding a  
21 third party received by People With Disabilities Foundation on May 13, 2008. Identifying  
22 information for this third party, who is not party to the instant actions, has been redacted.

23           10. Plaintiffs' Ex. GGG is a true and correct copy of a declaration by Plaintiff Doe on  
24 August 5, 2010.

25           11. I have attached as Exhibit PPP hereto a true and correct copy of my cover letter to  
26 August 17, 2010 letter to Philip Simon, Chief U.S. ALJ, and its enclosure, an August 12, 2010  
27 letter sent to me from Ariane Eroy, Ph.D.  
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