

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

AMERICAN CIVIL LIBERTIES UNION OF MINNESOTA,	Court File No.: 09-cv-00138 (DWF/JJG)
Plaintiff,	DECLARATION OF SHAMUS P. O'MEARA
vs.	
TAREK IBN ZIYAD ACADEMY, et al.	
Defendants.	

I, Shamus P. O'Meara, state and declare as follows:

1. I am an attorney with Johnson & Condon, P.A., the law firm retained to represent Defendants Tarek ibn Ziyad Academy, Asad Zaman, Asif Rahman, Mahrous Kandil, Mona Elnahrawy, Moira Fahey, and Mohamed Farid.
2. Attached as **Exhibit 1** is a true and accurate copy of Minnesota Secretary of State Certificate of Assumed Name for American Civil Liberties Union of Minnesota.
3. Attached as **Exhibit 2** is a true and accurate copy of the Minnesota Civil Liberties Union Articles of Incorporation, Notice of Change of Registered Office filed on or about January 8, 1991, Notice of Change of Registered Office/Registered Agent filed on or about January 20, 2001, and Minnesota Civil Liberties Union Certificate of Involuntary Dissolution.
4. Attached as **Exhibit 3** is a true and accurate copy of excerpts from the Deposition of Charles Samuelson.
5. Attached as **Exhibit 4** is a true and accurate copy of excerpts from the Deposition of Mona Elnahrawy.

6. Attached as **Exhibit 5** is a true and accurate copy of excerpts from the Deposition of Moira Fahey.
7. Attached as **Exhibit 6** is a true and accurate copy of excerpts from the Deposition of Asif Rahman.
8. Attached as **Exhibit 7** is a true and accurate copy of excerpts from the Deposition of Mohamed Farid.
9. Attached as **Exhibit 8** is a true and accurate copy of excerpts from the Deposition of Mahrous Kandil.
10. Attached as **Exhibit 9** is a true and accurate copy of excerpts from the Deposition of Asad Zaman.
11. Attached as **Exhibit 10** is a true and accurate copy of excerpts from the Deposition of Magdy Rabeaa.
12. Attached as **Exhibit 11** is a true and accurate copy of Deposition Exhibit Number 59.
13. Attached as **Exhibit 12** is a true and accurate copy of excerpts from the Deposition of Chas Anderson.
14. Attached as **Exhibit 13** is a true and accurate copy of Deposition Exhibit Number 485.
15. Attached as **Exhibit 14** is a true and accurate copy of excerpts from the Deposition of Tasia Islam.
16. Attached as **Exhibit 15** is a true and accurate copy of excerpts from the Deposition of Karen Anderson.

17. Attached as **Exhibit 16** is a true and accurate copy of excerpts from the Deposition of Clareen Menzies.
18. Attached as **Exhibit 17** is a true and accurate copy of excerpts from the Deposition of Ahmed El Bendary.
19. Attached as **Exhibit 18** is a true and accurate copy of correspondence from Timothy R. Obitts to Erick Kaardal, dated July 29, 2009.
20. Attached as **Exhibit 19** is a true and accurate copy of correspondence from Alice Seagren to Erick Kaardal, dated July 30, 2009.
21. Attached as **Exhibit 20** is a true and accurate copy of correspondence from Sarah Bushnell to Shamus O'Meara and Mark Azman, dated October 12, 2010.
22. Attached as **Exhibit 21** is a true and accurate copy of the Errata Sheets for the Deposition of Asad Zaman, Volumes I, II and III, dated November 24, 2010.
23. Attached as **Exhibit 22** is a true and accurate copy of a Business Organization Inquiry from the Minnesota Secretary of State website regarding the American Civil Liberties Union of Minnesota.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 7, 2010

s/ Shamus P. O'Meara

Shamus P. O'Meara

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