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20 J. DOE

21 UNITED STATES DISTRICT COURT  
22 EASTERN DISTRICT OF CALIFORNIA

23 J. Doe,

24 Plaintiff,

25 v.

26 Alvaro Rafael Saravia; and DOES 1-10  
27 inclusive,

28 Defendant.

Case No.: Civ-F-03-6249

**SUPPLEMENTAL DECLARATION  
OF MARY BETH KAUFMAN IN  
SUPPORT OF PLAINTIFF'S  
MOTION FOR JUDGMENT BY  
DEFAULT**

I, MARY BETH KAUFMAN, hereby declare as follows:

1. My name is MARY BETH KAUFMAN, and I have personal knowledge of the matters set forth in this declaration. If called upon to do so, I could and would testify competently thereto.

1           2.       I previously provided a declaration in this case, which I signed on January 8,  
2 2004 (the "January Declaration"). A copy of that declaration is attached hereto as Exhibit  
3 A. I have reviewed that declaration and hereby confirm that the contents of it were true and  
4 correct at the time I signed the declaration. The contents continue to be true and correct,  
5 with the lone exception that I am no longer employed as a fellow and attorney for the  
6 Center for Justice & Accountability as set forth in ¶¶1-2.

7           3.       I have reviewed the notes and reports I prepared prior to the January  
8 Declaration and have found additional information in those notes and reports which may  
9 assist the Court in this matter.

10          4.       During my December 16, 2003 conversation with Ines Olsson, referenced at  
11 ¶¶10-11 of the January Declaration, Ms. Olsson informed me that Alvaro Saravia arrived in  
12 Modesto, California, in 1990. Ms. Olsson said that she had met Mr. Saravia in Miami,  
13 Florida, and that she had been introduced to Mr. Saravia by her brother, Julio Villatoro.  
14 Ms. Olsson said that at that time she told Mr. Saravia about the type of city that Modesto  
15 was, and that he then decided to move to Modesto.

16          5.       During that same conversation on December 16, 2003, Ms. Olsson also told  
17 me that she knew that Mr. Saravia had a wife, a daughter and a son in Miami. Ms. Olsson  
18 said that Mr. Saravia rarely talked with his children. Ms. Olsson also said that she knew  
19 that Mr. Saravia had been in the Air Force in El Salvador.

20           I declare under penalty of perjury under the laws of the United States of America that  
21 the foregoing is true and correct.

22           Executed on this 1st day of September, 2004, in San Francisco, California.

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MARY BETH KAUFMAN