IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Twin-City Motor Company Building, LLC 2101 Superior Avenue East Cleveland, OH 44114)))
Plaintiff,))) Civil Case No 1:23-cv-00687
v.	
INTERNAL REVENUE SERVICE 1111 Constitution Avenue, N.W. Washington, D.C. 20224)))
Defendant.)))

DECLARATION OF VIVEK A. PATEL

- I, Vivek A. Patel, pursuant to 28 U.S.C. § 1746, declare as follows:
- 1. On November 3, 2022, I filed a request pursuant to the Freedom of Information Act ("FOIA"), 5. U.S.C. § 552, as amended, on behalf of Plaintiff, Twin-City Motor Company Building, LLC, seeking documents and records related to two appraisal reports prepared for Steven Holzer and the Internal Revenue Service by Howard Kanter Internal Revenue Service, LB&I Engineering Group 1843 (the "Twin-City FOIA Request," a true and correct copy of which is attached as Exhibit A).
- 2. Pursuant to delivery confirmation provided to me by the United States Postal Service (a true and correct copy of which is attached as Exhibit B), the Internal Revenue Service received the Twin-City FOIA Request on November 4, 2022.
- 3. On December 19, 2022, I received a letter dated December 12, 2022, from the Internal Revenue Service in connection with the Twin-City FOIA Request (the "December 12, 2022 Letter," a true and correct copy of which is attached as Exhibit C).

4. As of the date of this Declaration, neither Plaintiff nor I have received from the Internal Revenue Service a further response related to or any of the documents or records requested in the Twin-City FOIA Request.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 14, 2023.

Vivek A. Patel

Bar No. (1033178)

Baker & McKenzie, LLP

815 Connecticut Ave. N.W.

Washington, DC 20006

Phone: (202) 835-6124

Fax: (202) 416-7124

vivek.patel@bakermckenzie.com