

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**ROBERT L. BREUDER,** )  
 )  
**Plaintiff,** )  
 )  
**v.** )  
 )  
**BOARD OF TRUSTEES OF** )  
**COMMUNITY COLLEGE DISTRICT NO.** )  
**502, DUPAGE COUNTY, ILLINOIS, an** )  
**Illinois body politic and corporate,** )  
**KATHY HAMILTON in her official and** )  
**individual capacity, DEANNE** )  
**MAZZOCHI in her official and individual** )  
**capacity, FRANK NAPOLITANO in his** )  
**official and individual capacity, and** )  
**CHARLES BERNSTEIN in his official and** )  
**Individual capacity,** )  
**Defendants.** )

**No. 15 cv 9323**  
**Honorable Andrea R.**  
**Wood**  
**Magistrate Judge Jeffrey**  
**Cummings**

**DECLARATION OF KORY ATKINSON PURSUANT TO 28 U.S.C. § 1746**

I, Kory Atkinson, state under penalty of perjury under the laws of the United States of America that the following is true and correct to the best of my recollection:

1. My name is Kory Atkinson and I am currently 43 years old.
2. This Declaration is being prepared in response to this Court's December 23, 2020 Minute Order and specifically the defendant Board's Motion to clawback certain documents (Doc. No. 394).
3. Per the Court's orders, entered on December 5, 2019 and December 20, 2019, I was required to produce certain documents in my possession related to the Board of Trustee's subpoena.
4. I thereafter began producing the responsive documents on a rolling basis and completed my production of documents responsive to the subpoena by January 30, 2020. My production consisted of over 7,500 documents, totaling over 27,000 pages. My last page of my production is bates numbered KAA027146.
5. On January 30, 2020, I provided a privilege log for documents being withheld.



6. The memo which the Board seeks to clawback was produced in my January 30, 2020 production and the legal invoices at issue were contained in my January 27, 2020 production. This memo was attached as a pdf file to an email received by me on September 5, 2015 from then-Trustee Dianne McGuire's personal email. I was the only recipient on this particular email and the text in the body of the email included my name.
7. The memo was bates stamped KAA026980 - KAA026985. The email, to which the memo was attached, was bates stamped KAA026307.
8. I have not disclosed the documents that are the subject of this declaration, nor did I obtain them as part of discovery in this lawsuit.

FURTHER DECLARANT SAYETH NAUGHT.

Executed on the 4 day of January 2021.

  
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Kory Atkinson