EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

THE UNITED STATES OF AMERICA, Plaintiff, v. JOHN R. BOLTON, Defendant.	Civil Action No. 20-1580-RCL

DECLARATION OF MICHAEL W. KIRK IN SUPPORT OF DEFENDANT JOHN R. BOLTON'S OPPOSITION TO THE UNITED STATES' EMERGENCY APPLICATION FOR TEMPORARY RESTRAINING ORDER AND MOTION FOR PRELIMINARY INJUNCTION

Pursuant to 28 U.S.C. § 1746, I, Michael W. Kirk, hereby declare as follows:

1. I am counsel for Defendant John R. Bolton in the above-captioned matter. I am admitted to the bar of the District of Columbia and of the State of New York.

2. As Ambassador Bolton's counsel throughout the prepublication review of his book, *The Room Where It Happened: A White House Memoir*, I am familiar with the correspondence between various government officials and Ambassador Bolton or his attorneys relating to the book.

3. Attached as Exhibit E to Defendant's Combined Memorandum in Support of His Motion to Dismiss and in Opposition to Plaintiff's Emergency Application for Temporary Restraining Order and Motion for Preliminary Injunction ("Def. Mem.") is a true and correct copy of Email from Charles J. Cooper to Ellen Knight, Senior Director for Records, Access, and Information Security Management, National Security Council (Dec. 30, 2019, 11:34 AM).

4. Attached as Def. Mem. Exhibit F is a true and correct copy of Letter from Charles J. Cooper to Ellen Knight, Senior Director for Records, Access, and Information Security Management, National Security Council (Dec. 30, 2019).

5. Attached as Def. Mem. Exhibit G is a true and correct copy of Email from Ellen Knight, Senior Director for Records, Access, and Information Security Management, National Security Council, to Charles J. Cooper (Dec. 30, 2019, 2:50 PM).

6. Attached as Def. Mem. Exhibit H is a true and correct copy of Letter from Ellen Knight, Senior Director for Records, Access, and Information Security Management, National Security Council, to Charles J. Cooper (Jan. 23, 2020).

7. Attached as Def. Mem. Exhibit I is a true and correct copy of Letter from Ellen Knight, Senior Director for Records, Access, and Information Security Management, National Security Council, to Charles J. Cooper (Feb. 7, 2020).

8. Attached as Def. Mem. Exhibit J is a true and correct copy of Letter from Ellen Knight, Senior Director, Senior Director for Records, Access, and Information Security Management, National Security Council, to Charles J. Cooper (Feb. 24, 2020).

9. Attached as Def. Mem. Exhibit K is a true and correct copy of Email from Ellen Knight, Senior Director, Senior Director for Records, Access, and Information Security Management, National Security Council, to John Bolton, Former National Security Advisor, National Security Council (Mar. 27, 2020, 3:52 PM).

10. Attached as Def. Mem. Exhibit L is a true and correct copy of Letter from John Eisenberg, Legal Advisor, National Security Council, to Charles J. Cooper (Jun. 8, 2020).

11. Attached as Def. Mem. Exhibit M is a true and correct copy of Letter from Charles J. Cooper to John Eisenberg, Legal Advisor, National Security Council (Jun. 10, 2020).

12. Attached as Def. Mem. Exhibit N is a true and correct copy of Letter from Michael J. Ellis, Deputy Assistant to the President, to John R. Bolton (Jun. 16, 2020).

I declare under penalty of perjury under the laws of the United States of America that the foregoing Declaration is true and correct to the best of my knowledge.

Executed on the 18th day of June, 2020.

Michael W. Kirk