

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

AMERICAN BAR ASSOCIATION,

Plaintiff,

v.

EXECUTIVE OFFICE OF THE PRESIDENT,
et al.,

Defendants.

Civil Case No. 1:25-cv-01888-AHA

**DECLARATION OF STEPHEN SHACKELFORD, JR. IN SUPPORT OF
PLAINTIFF THE AMERICAN BAR ASSOCIATION’S OPPOSITION TO
DEFENDANTS’ MOTION TO DISQUALIFY SUSMAN GODFREY LLP**

1. I am counsel to the American Bar Association (“ABA”). I make this Declaration in support of the ABA’s Opposition to Defendants’ Motion to Disqualify Susman Godfrey LLP.

2. On July 2, 2026, counsel for the ABA received the Government’s Notice that it intends to serve subpoenas on fourteen non-party law firms, including Susman Godfrey LLP (“SG”). *See* ECF 67-1.

3. The Government’s Notice includes notice of an intent to serve a subpoena ad testificandum on Kalpana Srinivasan in her capacity as a managing partner of SG. *See* ECF 67-1, at 87. Ms. Srinivasan does not represent the ABA in this or any other matter.

4. On Friday, July 10, counsel for the Government asked for a call with counsel for the ABA to discuss “questions regarding the dynamic of Susman’s representation of the ABA in this case[.]” Counsel indicated that Defendants “do not intend to file any motion at this juncture.”

5. The parties met to discuss the issue on Wednesday, July 15, during which call counsel for the ABA identified several deficiencies in the Government's apparent interpretation of Rule 3.7.

6. On Thursday, July 16 at 6:44 p.m., counsel for the Government emailed counsel for the ABA stating that, in fact, "Defendants have decided to move forward with a motion to disqualify Susman Godfrey as counsel of record in this litigation." The Government indicated it was "willing to have a conversation tomorrow, no later than noon, if you have additional information you can provide about how Susman is addressing the apparent conflict of interest arising from its involvement in this litigation."

7. Counsel for the ABA conferred with the Government at 1 p.m. on Friday, July 17. The Government filed its Motion that same day.

8. None of the attorneys representing the ABA in this litigation are representing SG in connection with any subpoena that may be served pursuant to the Government's Notice. Counsel for the ABA informed the Government of this fact on the parties' meet and confer.

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

Executed on: July 27, 2026

/s/Stephen Shackelford, Jr.
Stephen Shackelford, Jr. (D.C. Bar #NY0443)
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CERTIFICATE OF SERVICE

I hereby certify that on July 27, 2026, I caused the foregoing to be electronically filed with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

Date: July 27, 2026

/s/Stephen Shackelford, Jr.
Stephen Shackelford, Jr.