

Civil Action No. 1:12-cv-00327 (ABJ)

EXHIBIT D

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ELECTRONIC PRIVACY INFORMATION)	
CENTER, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 1:12-cv-00327 (ABJ)
)	
THE UNITED STATES DEPARTMENT)	
OF EDUCATION,)	
)	
Defendant.)	

DECLARATION OF PLAINTIFF DEBORAH PEEL

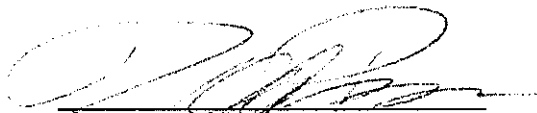
I, DEBORAH PEEL, of full age, hereby declare to the best of my knowledge and belief:

1. My name is Deborah Peel. I reside in Austin, Texas. I am a plaintiff in this case.
2. I make this declaration as a supplement to my first declaration, which I incorporate herein by reference, and to further support my claims that an educational institution that I attended still maintains my non-directory information.
3. I received my M.D. in 1974 from the University of Texas Medical Branch (“UTMB”) in Galveston, Texas. In 1977, I completed my Residency in General Adult Psychiatry at UTMB in Galveston, Texas.
4. On February 10, 2013, I emailed the University Registrar at UTMB and requested whether the university currently maintains my transcript and Social Security number.
5. On February 12, 2013, I received an email response back for the University Registrar informing me that UTMB manages my transcript in perpetuity as my permanent academic record. The Registrar also stated that at the time I attended UTMB, the

university used my Social Security number as my student identification number, and thus my Social Security number is attached to my transcript.

6. UTMB maintains my transcript and Social Security number.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration is executed in Austin, Texas on February 14, 2013.



DEBORAH PEEL
Member,
EPIC Advisory Board
EPIC Board of Directors