

STATE OF MINNESOTA  
COUNTY OF RAMSEY

DISTRICT COURT  
SECOND JUDICIAL DISTRICT  
CASE TYPE: OTHER CIVIL

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Public Record Media,  
Plaintiff,

Court File No. 62-CV-18-4335  
Honorable Leonardo Castro

v.

Minnesota Department of Employment and  
Economic Development,

**DECLARATION OF  
MICHAEL LANGLEY**

and

Greater MSP,

Defendants.

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I, Michael Langley, hereby state and declare as follows:

1. I am the Chief Executive Officer of Defendant Greater MSP. Unless otherwise noted, I have personal knowledge of the matters set forth herein.

2. Greater MSP is a private, non-profit organization with a registered office address of 400 Robert Street North, #1520, St. Paul, Minnesota 55101.

3. Greater MSP entered into a non-disclosure agreement with Amazon concerning information Greater MSP may receive about Amazon's operations and businesses in connection with Amazon's evaluation of various sites for operations and businesses.

4. Greater MSP, alone, drafted and submitted the bid in response to Amazon's request for proposals ("RFP") for its second headquarters ("HQ2") (the "Bid").

5. The Minnesota Department of Employment and Economic Development (“DEED”) provided data through a cloud-based service called Box (the “Box”). Greater MSP reviewed and incorporated said data when drafting the Bid.

6. Institutions of higher education and cities within the 16-county Minneapolis-St. Paul Region provided data to Greater MSP via email. Greater MSP reviewed and incorporated said data when drafting the Bid.

7. The Bid is a detailed, specific and innovative strategy used to advance economic development in the Region.

8. Greater MSP has allowed only eight hard copies of the Bid to be printed—five of the copies were sent to Amazon, two copies are stored securely at Greater MSP’s office, and one copy is in the possession of Greater MSP’s counsel of record, Briggs and Morgan.

9. One of the two hard copies of the Bid that Greater MSP retained is filed securely in my office.

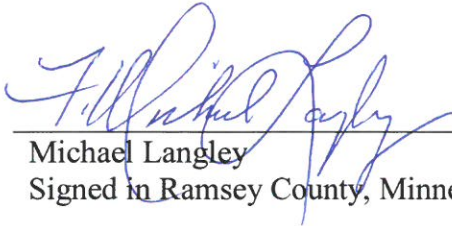
10. Greater MSP did not form an agreement—oral, written, or otherwise—concerning the Bid.

11. Greater MSP did not receive any monetary compensation from DEED or any other government entity for drafting and submitting the Bid.

12. Greater MSP did not give DEED or any other government entity monetary compensation for any data it received in drafting the Bid.

I declare under penalty of perjury that everything I have stated in this Declaration is true and correct.

Dated: October 22, 2018



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Michael Langley  
Signed in Ramsey County, Minnesota

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