

Issued by the
UNITED STATES DISTRICT COURT

Central DISTRICT OF California

ROBERT G. WRIGHT, JR.

SUBPOENA IN A CIVIL CASE

V.

CASE NUMBER: No. 03 C 5876 (N.D. Ill.)

FEDERAL BUREAU OF INVESTIGATION, et al.

TO: James Crogan
 11838 Magnolia Blvd.
 Valley Village, CA 91607

YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION Judicial Watch, Inc., 2540 Huntington Drive, Suite 201 San Marino, CA 91108 (626) 287-4540	DATE AND TIME December 10, 2004 at 10:00 a.m.
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YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

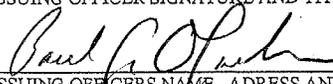
See Attachment A

PLACE Judicial Watch, Inc., 2540 Huntington Drive, Suite 201 San Marino, CA 91108 (626) 287-4540	DATE AND TIME December 10, 2004 at 10:00 a.m.
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YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME
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Any organization not a party to this suite that is subpoenaed for the taking of a deposition shall designate on or more officers, directors, or managing agent, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)  Attorney for Plaintiff	DATE November 8, 2004
ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER Paul J. Orfanedes, Judicial Watch, Inc., 501 School Street, S.W., Suite 500 Washington, DC 20024 (202) 646-5172	

ATTACHMENT A

DEFINITIONS

The following words or terms shall be deemed to mean the following:

A. The terms “Document” or “Documents” are used in the broadest sense and include, but are not limited to, the following items in your actual or constructive possession, custody or control, whether such items are typed, printed, recorded, stored in a computer, reproduced by any mechanical process, or copied or written by hand: contracts, communications, correspondence, telegrams, memoranda, statements, records, reports, books, summaries and/or recordings of telephone conversations, summaries and/or recordings of personal conversations, lists, manuals, databases, quotes, bids, rating methodologies, diaries, forecasts, orders, bills, invoices, checks, studies, graphs, charts, accounts, work papers, indexes, data sheets, data processing cards, analytical records, minutes and/or records of meetings and conferences, reports and/or summaries of interviews, reports and/or opinions of consultants, attorneys, accountants and/or financial advisors, records, reports and/or summaries of negotiations, brochures, lists, periodicals, pamphlets, circulars, trade letters, newspaper clippings, press releases, notes, projections, drafts, working papers, copies, marginal notations, photographs, drawings, tape recordings, financial statements, summaries, reports, records and the like, and all other written, printed, recorded or graphic matter, photographic matter, or sound production, however produced or reproduced. “Document” or “Documents” also shall mean any drafts, alterations, amendments, changes, or modifications of or to any of the foregoing.

B. The terms “Communication” or “Communications” refer to any transmission of any sort whatsoever, by one or more person, to one or more persons, by any means whatsoever, including, but not limited to, telephone conversations, letters, electronic mail, telegrams, teletypes, teletypes, telexes, written memoranda, radio, cable, television, and face-to-face conversations or meetings.

C. The terms “You” or “Your” or “Yourself” refer to James Crogan and/or your agents, representatives, employees, successors in interest, and/or persons or entities acting on your behalf.

D. The term “Person” refers to any natural person, firm, sole proprietorship, association, partnership, limited partnership, joint venture, corporation, or other form of legal entity.

E. The terms “Refer,” “Relate,” “Regarding” and/or “Concerning” mean affecting, bearing upon, comprising, concerning, constituting, containing, dealing with, embodying, embracing, encompassing, entailing, evidencing, germane to, identifying, implicating, including, incorporating, involving, pertaining to, regarding, relating to, referring to, or reflecting in any manner.

F. The term “Special Agent Wright” refers to Special Agent Robert G. Wright, Jr. of the Federal Bureau of Investigation’s Chicago Field Office.

G. The term “FBI” refers to the Federal Bureau of Investigation.

H. Any reference to an individual shall mean that individual, in his personal and professional capacity, and all agents or representatives of that individual, as well as all persons and entities acting or purporting to act on that individual’s behalf.

I. Any reference to an entity shall mean that entity, all agents or representatives of that entity, and all persons or entities acting or purporting to act on that entity’s behalf.

J. As may be necessary to bring within the scope of any interrogatory or request any response that might otherwise be construed to be outside its scope, the following shall apply: all uses of the conjunctive “and” herein include the disjunctive “or” and vice versa; all words in the singular include the plural and vice versa; all uses of the masculine gender include the feminine gender and vice versa; and all verb tenses shall include the past, present, and future tenses.

K. For purposes of these requests, the relevant time period is from 2003 through the present, unless otherwise specified.

DOCUMENT REQUESTS

1. All documents concerning, relating to, or reflecting contacts or communications between you and Special Agent Royden R. Rice (a.k.a. Ross Rice) of the FBI’s Chicago Field Office regarding Special Agent Wright.

2. All documents provided to you by or obtained by you from Special Agent Royden R. Rice (a.k.a. Ross Rice) of the FBI’s Chicago Field Office concerning or relating to Special Agent Wright.

3. All documents concerning, relating to or reflecting contacts or communications between you and David P. Schippers, Esq. of Chicago, Illinois, regarding FBI Special Wright.