

None.

(e) Mike McCurry

None.

Interrogatory No. 29

Identify any and all communications you had with Hillary Rodham Clinton relating to the use of FBI background investigation files, or summary reports, or raw data on persons included in the attached list (Exhibit 1).

Response:

(a) Sidney Blumenthal

None.

(b) Rahm Emanuel

None.

(c) Bruce Lindsey

None.

(d) Ann Lewis

None.

(e) Mike McCurry

None.

Interrogatory No. 30

Identify any and all communications you had with Hillary Rodham Clinton relating to the obtaining of the FBI files of former White House travel Office employees Billy Ray Dale, John Dreylinger, Barney Brasseux, Ralph Maughan, Robert Van Eimeren, John McSweeney, or Gary Wright.

Response:

(a) Sidney Blumenthal

None.

(b) Rahm Emanuel

None.

(c) Bruce Lindsey

None.

(d) Ann Lewis

None.

(e) Mike McCurry

None.

Interrogatory No. 31

Identify any and all communications you had with Hillary Rodham Clinton relating to release or use of information from Linda Tripp's Department of Defense files.

Response:

(a) Sidney Blumenthal

None.

(b) Rahm Emanuel

None.

(c) Bruce Lindsey

None.

(d) Ann Lewis

None.

(e) Mike McCurry

None.

Interrogatory No. 32

Identify any and all communications you had with Hillary Rodham Clinton relating to release or use of documents from Kathleen Willey to President Clinton or his aides, release or use of documents from President Clinton or his aides to Kathleen Willey, or documents relating to telephone calls or visits between Kathleen Willey and President Clinton or his aides.

Response:

(a) Sidney Blumenthal

See Response No. 42.

(b) Rahm Emanuel

None.

(c) Bruce Lindsey

None.

(d) Ann Lewis

None.

(e) Mike McCurry

None.

Interrogatory No. 33

Identify any and all communications you had with Hillary Rodham Clinton relating to George Stephanopoulos' comments regarding the "Ellen Rometsch strategy" on the February 8, 1998 edition of ABC's "This Week" (Exhibit 2).

Response:

(a) Sidney Blumenthal

None.

(b) Rahm Emanuel

None.

(c) Bruce Lindsey

None.

(d) Ann Lewis

None.

(e) Mike McCurry

None.

Interrogatory No. 34

Identify any and all meetings in which you participated, or of which you are aware, relating to the use of FBI background investigation files, or summary reports, or raw data on persons included in the attached list (Exhibit 1), including in your answer: (a) the date of the meeting; (b) the location of the meeting; (c) the identity of all persons who participated in the meeting; (d) what was said by each individual, and (e) the subject matter discussed.

Response:

(a) Sidney Blumenthal

None.

(b) Rahm Emanuel

None.

(c) Bruce Lindsey

The only meetings in which Mr. Lindsey participated regarding the use of FBI background investigation files, or summary reports, or raw data on any person listed in Exhibit 1 pertain to nominees for high-level positions in the Clinton Administration, whose vetting Mr. Lindsey was either involved in or aware of. See Responses Nos. 9, 19. Those nominees who appear on Exhibit 1 and whose names Mr. Lindsey recognizes are Bobby Ray Inman, and Polly Barragan Baca. With respect to these people's nomination for public office, Mr.

Lindsey would have had meetings or discussions about the candidate's general suitability for the position nominated.

Mr. Lindsey remembers meetings regarding Mr. Inman around the time of his nomination, in or around January 1994, although Mr. Lindsey cannot remember the dates of specific meetings. The location of the meetings were the White House Counsel's Office, and at least one in the Oval Office. The attendees of the meetings in the Counsel's Office, to the extent Mr. Lindsey can remember, were Bernard Nussbaum, Joel Klein, and potentially other members of the Counsel's Office. The meeting in the Oval Office would have included the same individuals as well as the President. The subject matter of the meetings were the nomination and general suitability of the individuals for public office.

EOP objects to Interrogatory No. 34, subparts (d) and (e), to the extent it seeks to discover the substance of meetings Mr. Lindsey engaged in regarding these nominees, as irrelevant and overbroad, and as seeking information protected by the presidential communications and deliberative process privileges. In addition, EOP objects to providing the substance of meetings Mr. Lindsey had regarding these nominees on the basis of personal privacy and Rule 26 of the Federal Rules of Civil Procedure.

(d) Ann Lewis

None, other than one meeting with Sally Paxton of the White House Counsel's Office, and Elizabeth Shapiro of the Department of

Justice, about the notice for Ms. Lewis's deposition that was issued in this case. Ms. Lewis does not remember the precise date of that meeting, but it would have been sometime in March 1998. The meeting took place in Ms. Lewis's office at the White House. Ms. Paxton, Ms. Shapiro and Ms. Lewis were the only people in attendance. The purpose of the meeting was to discuss the notice for Ms. Lewis's deposition and to prepare a declaration to support the EOP's motion for protective order with regard to that deposition.

EOP objects to Interrogatory No. 34 on the basis of attorney-client privilege and attorney work product doctrine, to the extent it seeks to discover the substance of the communications between Ms. Lewis, Ms. Paxton and Ms. Shapiro.

(e) Mike McCurry

When the FBI files matter became public, the subject of the circumstances of the White House's acquisition of FBI files on persons who no longer needed access to the White House was discussed at one or more daily morning meetings of White House senior staff, in which Mr. McCurry participated. The dates of such meetings would have been after early June 1996, when the FBI files matter became public. The daily meetings generally took place in Leon Panetta's office in the White House. Mr. McCurry does not recall who participated in any meetings where the FBI files matter was discussed, except that senior White House staff generally attend the daily morning meetings. Mr. McCurry does not recall what was said by specific individuals, except that White House Counsel Jack Quinn

briefed senior White House staff on the progress of efforts to discover the circumstances of the White House's acquisition of the FBI files.

Mr. McCurry does not recall with specificity, but believes there was a subsequent meeting or meetings in Mr. Panetta's or Mr. Quinn's office to discuss the White House response to media inquiries regarding the FBI files matter. Mr. McCurry does not recall who else might have participated in such a meeting or meetings, and does not recall what was said by specific individuals.

Mr. McCurry also probably participated in a meeting with the President to brief the President about responding to media inquiries regarding the FBI files matter. Mr. McCurry does not recall who else participated in such a meeting, but typical participants would have been Mr. Stephanopoulos, Harold Ickes, Mr. Panetta, and Jane Sherburne. Typically, such a meeting would have taken place in the Oval Office.

Mr. McCurry also participated in two meetings with Sally Paxton of the White House Counsel's Office, and Elizabeth Shapiro of the Department of Justice, about the notice for Mr. McCurry's deposition that was issued in this case. Mr. McCurry does not remember the precise date of the meetings, but both would have been sometime in March, 1998. One meeting took place in Ms. Paxton's office at the White House, and the other in Mr. McCurry's office at the White House. Ms. Paxton, Ms. Shapiro and Mr. McCurry were the only people in attendance at both meetings. The purpose of the meetings was to

discuss the notice for Mr. McCurry's deposition and to prepare a declaration to support the EOP's motion for protective order with regard to that deposition.

EOP objects to Interrogatory No. 34 to the extent that it seeks to discover the substance of communications protected by the presidential communications privilege, deliberative process privilege, the attorney-client privilege, and the attorney work product doctrine.

Interrogatory No. 35

Identify any and all meetings in which you participated, or of which you are aware, relating to the obtaining of FBI files of former White House travel Office employees Billy Ray Dale, John Dreylinger, Barney Brasseux, Ralph Maughan, Robert Van Eimeren, John McSweeney, or Gary Wright including in your answer: (a) the date of the meeting; (b) the location of the meeting; (c) the identity of all persons who participated in the meeting; (d) what was said by each individual, and (e) the subject matter discussed.

Response:

(a) Sidney Blumenthal

None.

(b) Rahm Emanuel

None.

(c) Bruce Lindsey

None.

(d) Ann Lewis

Ms. Lewis has no memory of specifically discussing the Travel Office employees. To the extent that the obtaining of Mr. Dale's file was encompassed within the FBI files matter generally, Ms.

Lewis's conversation on this topic with Jane Sherburne is described at Response No. 11. In addition, Ms. Lewis met with Sally Paxton of the White House Counsel's office and Elizabeth Shapiro of the Department of Justice, and met on a separate occasion with Ms. Paxton and Allison Giles of the Department of Justice, in connection with Ms. Lewis's anticipated deposition in this litigation. Ms. Lewis does not remember the subject of Mr. Dale being discussed specifically, but it could have been discussed in the context of the FBI files matter generally. Ms. Lewis does not remember when these meetings occurred, but believes they would have been in March 1998, some time after the notice of Ms. Lewis's deposition. Ms. Lewis met with Ms. Paxton and Ms. Shapiro in Ms. Lewis' office in the White House, and with Ms. Paxton and Ms. Giles in Ms. Paxton's Office in the Old Executive Office Building. See Response No. 34.

EOP objects to Interrogatory No. 35 to the extent that it seeks to discover the substance of communications protected by the attorney-client privilege, and the attorney work product doctrine.

(e) Mike McCurry

Of the names listed in this interrogatory, Mr. McCurry only recognizes Billy Dale. With respect to Mr. Dale, see Response No. 34.

Interrogatory No. 36

Identify any and all meetings in which you participated, or of which you are aware, relating to the release or use of information from Linda Tripp's Department of Defense files, including in your answer: (a) the date of the meeting; (b) the location of the meeting; (c) the identity of all persons who participated in the meeting; (d) what was said by each individual, and (e) the subject matter

discussed.

Response:

(a) Sidney Blumenthal

Mr. Blumenthal does not recall participating in any meetings on the subject of this interrogatory.

(b) Rahm Emanuel

Mr. Emanuel does not recall participating in any meetings on the subject of this interrogatory.

(c) Bruce Lindsey

Although Mr. Lindsey cannot recall participating in a specific meeting on this, it is possible that subsequent to the media reports of the disclosure of information from Ms. Tripp's DoD file, the issue may have been discussed as part of a daily strategy meeting. If the topic came up, the only discussion about it would have been that if the White House received press inquiries on this subject, it should refer the matter to DoD for a response.

(d) Ann Lewis

Although Ms. Lewis cannot recall participating in a specific meeting on this, it is possible that subsequent to the media reports of the disclosure of information from Ms. Tripp's DoD file, the issue may have been discussed as part of a daily strategy meeting. That meeting would have occurred shortly after the media reported the release of this information, and most likely would have been held in the Counsel's office. The likely participants would have been members of the Counsel's office and other senior advisors to the

President, whom Ms. Lewis cannot identify since she had no actual recollection of such a discussion. If the topic came up, the only discussion about it would have been that if the White House received press inquiries on this subject, it should refer the matter to DoD for a response.

(e) Mike McCurry

Although Mr. McCurry cannot recall participating in a specific meeting on this, it is possible that subsequent to the media reports of the disclosure of information from Ms. Tripp's DoD file, the issue may have been discussed as part of a daily strategy meeting. If the topic came up, the only discussion about it would have been that if the White House received press inquiries on this subject, it should refer the matter to DoD for a response.

Interrogatory No. 37

Identify any and all meetings in which you participated, or of which you are aware, relating to release or use of documents from Kathleen Willey to President Clinton or his aides, release or use of documents from President Clinton or his aides to Kathleen Willey, or documents relating to telephone calls or visits between Kathleen Willey and President Clinton or his aides, including in your answer: (a) the date of the meeting; (b) the location of the meeting; (c) the identity of all persons who participated in the meeting; (d) what was said by each individual, and (e) the subject matter discussed.

Response:

(a) Sidney Blumenthal

As described in Response No. 42, Mr. Blumenthal was out of the country at the time the Willey letters were released. Mr. Blumenthal participated in no meetings relating to the release of the Willey letters, nor is he aware of any such meetings.

(b) **Rahm Emanuel**

Mr. Emanuel recalls no specific meetings relating to the release of the Willey letters. However, Mr. Emanuel recalls being generally aware of the existence of the letters, which he had not seen prior to their release, and recalls generally discussing with other senior staff his belief that information bearing on Ms. Willey's credibility, including the Willey letters, should be made available to the public. See also Response No. 15.

EOP objects to Interrogatory No. 37 to the extent it seeks to discover the substance of the discussions between Mr. Emanuel and senior White House staff regarding the Willey letters on the basis of the deliberative process privilege.

(c) **Bruce Lindsey**

Mr. Lindsey recalls meeting with Mr. Ruff and Ms. Mills during the weekend of Ms. Willey's "60 Minutes" appearance, which would have been March 14 or 15, 1998. The discussions took place in the West Wing Counsel's Office suite. The purpose of the discussions was to discuss the Willey letters that Mr. Lindsey had in his possession, and to make a collective judgment about whether to release them to the press. See also Response No. 15.

Mr. Lindsey believes that there may have been meetings subsequent to the release of the letters to discuss how the White House should respond to press inquiries. Mr. Lindsey does not remember, however, the precise dates, the participants, the location,