

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JUDICIAL WATCH, INC.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 13-cv-1363 (EGS)
)	
U.S. DEPARTMENT OF STATE,)	
)	
Defendant.)	
)	

PLAINTIFF’S INTERROGATORIES TO CHERYL D. MILLS

Plaintiff Judicial Watch, Inc., pursuant to agreement with Cheryl D. Mills, requests that Ms. Mills fully answer the following interrogatories under oath, as required by Fed. R. Civ. P. 33, in attempt to resolve a discovery dispute concerning Ms. Mills’ refusal to answer certain questions posed to her at her May 27, 2016 court-ordered deposition in this lawsuit.

DEFINITIONS

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

1. The term “clintonemail.com email system” shall mean the email system, server(s), provider(s) and infrastructure that hosted the email accounts used by former Secretary of State Hillary Rodham Clinton and her deputy chief of staff, Huma Abedin, during their tenure at the State Department with the domain name “clintonemail.com.”

2. The term “clintonemail.com email account” for former Secretary of State Hillary Rodham Clinton shall mean the email account used by Secretary Clinton during her tenure at the State Department with the domain name “clintonemail.com.”

3. The term “clintonemail.com email account” for Huma Abedin shall mean the email account used by Ms. Abedin during her tenure at the State Department with the domain name “clintonemail.com.”

4. The term “concerning” shall mean affecting, bearing upon, comprising, 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.

5. The term “describe” shall mean to fully and completely state, explain, illustrate, characterize, define, delineate, recount, detail, designate, expound, elucidate, or recapitulate.

INSTRUCTIONS

1. If you object to any interrogatory on the grounds that the interrogatory calls for information that is subject to a claim of privilege, state with specificity the privilege that is claimed to apply and identify all information sufficient to permit Plaintiff to contest the claim of privilege and to permit the Court to reach a determination concerning the validity of the claim of privilege, together with the factual and legal basis for the claim of privilege.

INTERROGATORIES

1. Describe with specificity each conversation you had with Bryan Pagliano concerning the setup of the “clintonemail.com” system that hosted Secretary Clinton’s and Ms. Abedin’s “clintonemail.com” email accounts, including, to the extent such issues were discussed, any and all server(s) used for the system and accounts, when the servers and accounts were set up, who set them up, where they were set up, how they were set up, and why they were set up. Also include in your answer, when each conversation took place, names of all persons present during each conversation, method of communication (whether in person or otherwise) and the

approximate duration of each conversation. You may limit your answer to the time period after you left the State Department on or around February 1, 2013.

2. Name all individuals Bryan Pagliano identified, if any, in all conversations described in your answers to Interrogatory No. 1 above with knowledge about the setup of the “clintonemail.com” system. Include in your answer the title and positions of all persons he identified, including but not limited to all employees identified from the State Department.

3. Describe with specificity each conversation you had with Justin Cooper concerning the setup of the “clintonemail.com” system that hosted Secretary Clinton’s and Ms. Abedin’s “clintonemail.com” email accounts, including, to the extent such issues were discussed, any and all server(s) used for the system and accounts, when the servers and accounts were set up, who set them up, where they were set up, how they were set up, and why they were set up. Also include in your answer, when each conversation took place, names of all persons present during each conversation, method of communication (whether in person or otherwise) and the approximate duration of each conversation. You may limit your answer to the time period after you left the State Department on or around February 1, 2013.

4. Name all individuals Justin Cooper identified, if any, in all conversations described in your answers to Interrogatory No. 3 above with knowledge about the setup of the “clintonemail.com” system. Include in your answer the title and positions of all persons he identified, including but not limited to all employees identified from the State Department.

5. Describe with specificity each conversation you had with Oscar Flores concerning the setup of the “clintonemail.com” system that hosted Secretary Clinton’s and Ms. Abedin’s “clintonemail.com” email accounts, including, to the extent such issues were discussed, any and all server(s) used for the system and accounts, when the servers and accounts were set up, who

set them up, where they were set up, how they were set up, and why they were set up. Also include in your answer, when each conversation took place, names of all persons present during each conversation, method of communication (whether in person or otherwise) and the approximate duration of each conversation. You may limit your answer to the time period after you left the State Department on or around February 1, 2013.

6. Name all individuals Oscar Flores identified, if any, in all conversations described in your answers to Interrogatory No. 5 above with knowledge about the setup of the “clintonemail.com” system. Include in your answer the title and positions of all persons he identified, including but not limited to all employees identified from the State Department.

Dated: June 30, 2016

Respectfully submitted,

/s/ Ramona R. Cotca

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