

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

JUDICIAL WATCH, INC.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 14-cv-1242 (RCL)
)	
U.S. DEPARTMENT OF STATE,)	
)	
Defendant.)	
)	

**PLAINTIFF JUDICIAL WATCH, INC.’S INTERROGATORIES TO
DEFENDANT U.S. DEPARTMENT OF STATE**

Plaintiff Judicial Watch, Inc., pursuant to the Court’s January 15, 2019 Memorandum and Order and Rule 33 of the Federal Rules of Civil Procedure, submits the following interrogatories to be answered under oath by Defendant U.S. Department of State.

INSTRUCTIONS AND DEFINITIONS

1. Your answers to these interrogatories should include information within your actual or constructive possession, custody, or control, including information which may be held by your attorneys, representatives, all persons acting under, by, or through you, or subject to your control or supervision, and all persons acting on your behalf.

2. If you cannot answer an interrogatory fully and completely, answer as much as you can and provide all facts upon which you rely in support of your contention that you cannot answer fully and completely. In each instance in which you claim insufficient knowledge or information to answer an interrogatory fully and completely, describe all of the efforts you made to locate the information needed to answer the interrogatory and identify each person, if any, who is known by you to have such information.

3. In answering an interrogatory, state whether the information furnished in the answer is within the personal knowledge of the person answering and, if not, identify each person who has personal knowledge of the information furnished in the answer.

4. If you object to any portion of an interrogatory, but not the entire interrogatory, identify the specific portion of the interrogatory to which objection is made and answer the portion of the interrogatory to which no objection is made.

5. If you object to any interrogatory on the grounds that the interrogatory is overly broad or unduly burdensome, answer the interrogatory by providing all information that is not alleged to be overly broad or unduly burdensome and identify the nature, quality, quantity, or volume of the withheld information and the effort that would be required to provide the withheld information.

6. If you object to any interrogatory on the grounds that the interrogatory calls for information that is subject to a claim of privilege, state 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.

7. “And” and “or” are to be construed both conjunctively and disjunctively, as necessary, to make the interrogatory inclusive rather than exclusive. Similarly, any use of the singular shall also mean the plural and vice versa, to give the interrogatory its broadest possible meaning.

8. The definitions provided below are hereby incorporated into each interrogatory in which the term appears:

a. “Identify” when used with respect to a natural person means state the person’s full name, present or last known business address (or, if no business address, home address), and the person’s employer and position at the time in question with respect to the particular interrogatory involved.

b. “Office of the Secretary” refers to the Office of the Secretary within the U.S. Department of State.

c. “State Department” refers to the U.S. Department of State.

INTERROGATORIES

1. Identify the individuals referenced in the first full paragraph on the fourth page of the Federal Bureau of Investigation’s December 30, 2015 report (available at ECF No. 62-1) describing its December 22, 2015 interview of Bryan Pagliano.

2. Identify the analysts who performed the search of the Office of the Secretary records on September 23, 2014 described in paragraphs 14-16 of John F. Hackett’s July 7, 2015 declaration (available at ECF 19-2).

3. Identify the individuals who performed the search described in paragraph 17 of John F. Hackett’s July 7, 2015 declaration (available at ECF 19-2) as well as the dates they searched.

4. Identify the number of emails contained within State Department records sent to or from the clintonemail.com domain name – including the “carbon copy” and “blind copy” functions – for the time period from September 11, 2012 to February 2, 2013 for the following individuals:

- Alice Wells;
- Andrew Shapiro;
- Anne-Marie Slaughter;
- Caroline Adler;

- Cheryl Mills;
- Claire Coleman;
- Dan Schwerin;
- Huma Abedin;
- Jacob Sullivan;
- Joseph MacManus;
- Judith McHale;
- Lauren Jiloty;
- Lona Valmoro;
- Maria Sand;
- Melanne Vermeer;
- Monica Hanley;
- Patrick Kennedy;
- Philippe Reines;
- Richard Verma;
- Robert Russo;
- Susan Rice;
- Victoria Nuland;
- Wendy Sherman; and
- William Burns.

Dated: January 15, 2019

Respectfully submitted,

/s/ Michael Bekesha

Michael Bekesha

D.C. Bar No. 995749

JUDICIAL WATCH, INC.

Counsel for Plaintiff Judicial Watch, Inc.