



that are beyond the scope of the Federal Rules of Civil Procedure.

2. EOP objects to Instruction No. 2, regarding the identification of "each person who may have personal knowledge" and "each person who communicated to the affiant any part of the information furnished" as unduly burdensome, vague, unworkable, and seeking to impose requirements that are beyond the scope of the Federal Rules of Civil Procedure.

3. EOP objects to Instruction No. 3 to the extent it seeks to impose requirements for the preparation of a privilege log that are beyond the scope of Rule 26(b)(5), Fed. R. Civ. P.

4. EOP objects to Definition No. 1, which defines "person" or "persons", as overbroad, vague and unworkable. EOP, for example, would not be able to know all persons "purporting" to act on every other person's behalf, or would not be able to identify all "assignees" or "associates" of all other persons.

5. EOP object to Definition No. 3, which defines "communication" or "communications" to include "any other means of transmitting information", as vague and overbroad.

6. EOP objects to Definition No. 6, which requests that EOP identify each corporation of which any person is officer or director, each business in which such person is principal, such person's position(s) "at the time of the act to which the interrogatory answer relates," "each position he has ever held with you, and the date such positions were held," and "such other information to sufficiently identify the person," as vague, overbroad, unduly burdensome, invasive of individuals' privacy

rights, and seeking to impose requirements regarding the identification of any person that are beyond the scope of the Federal Rules of Civil Procedure.

7. EOP objects to Definition No. 8 as vague and overbroad to the extent it purports to construe "you" and "yours" as "current and/or past employees of Defendant Executive Office of the President."

8. EOP objects to Definition No. 9 insofar as it purports to include in the definition of "White House" the residence of the President of the United States.

9. EOP objects generally to the identification of "all communications" as overbroad and unduly burdensome to the extent it calls for publically available material, including, but not limited to, press clips and press briefings, and publically available testimony.

10. EOP objects to identifying specific telephone extensions within the White House as irrelevant.

11. EOP objects generally as irrelevant to the identification of "all communications" to the extent it seeks to discover the substance of conversations between the enumerated individuals and private counsel regarding any of the matters raised in these interrogatories. EOP construes these interrogatories not to include such meetings and communications with counsel, other than meetings with government counsel, which are identified and objected to on an individual basis.

RESPONSES AND OBJECTIONS TO SPECIFIC INTERROGATORIES

In addition to the foregoing general objections, and without prejudice to their continued assertion, EOP responds and objects as follows to plaintiffs' interrogatories:

Interrogatory No. 1: Identify any and all positions you held at the White House and provide the dates you held such positions.

Response:

(a) Sidney Blumenthal

Mr. Blumenthal is currently Assistant to the President and has held that position since August 1997. Prior to that time, Mr. Blumenthal was not employed in any capacity by the White House.

(b) Rahm Emanuel

Mr. Emanuel was employed by the White House from January 1993, until October 1998, with the title of, or equivalent rank of, Assistant to the President at all times. His positions at the White House were Assistant to the President and Director of Political Affairs (Jan. 1993- July 1993), Assistant to the President and Deputy Director of Communications (July 1993-Jan. 1995), Assistant to the President and Director of Special Projects (Feb. 1995-Dec. 1996), and Senior Advisor to the President for Policy and Strategy and Executive Assistant to the Chief of Staff (Jan. 1997 - Oct. 1998).

(c) Bruce Lindsey

Since January 1993, Mr. Lindsey has been employed by the Executive Office of the President as an Assistant to the President. He began his White House service as an Assistant to the President,

Senior Advisor to the President and Director of Presidential Personnel. He held that position until approximately November 1993. From November 1993, until approximately October 1994, Mr. Lindsey served as Assistant to the President and Senior Advisor. In October 1994, Mr. Lindsey became an Assistant to the President and Deputy White House Counsel, a position he continues to hold today.

(d) Ann Lewis

Ms. Lewis began her White House employment in January 1997, as Assistant to the President and Deputy Director of Communications. In mid-May 1997, Ms. Lewis became Assistant to the President and Director of Communications, and held that position until March 1999. At that time, Ms. Lewis became Counselor to the President, the position which she holds today.

(e) Mike McCurry

Mr. McCurry worked at the White House from January, 1995 to October, 1998, as Assistant to the President and Press Secretary.

Interrogatory No. 2: Describe all of your duties and responsibilities in each position identified in response to Interrogatory No. 1.

Response:

(a) Sidney Blumenthal

As Assistant to the President, Mr. Blumenthal works on a variety of domestic and foreign issues, as requested by the President or members of the President's staff.

(b) Rahm Emanuel

Mr. Emanuel's duties in his various positions involved assisting

and advising the President on substantive matters of domestic policy, including such issues as welfare reform, immigration reform, crime, and drug control policy. In these positions, Mr. Emanuel coordinated communications, strategic planning, legislative relations and policy development for the matters listed above. Mr. Emanuel also assisted with events such as the signing of the Mideast peace agreement in 1993.

(c) Bruce Lindsey

Mr. Lindsey's duties in the positions described above involved, and still involve, assisting and advising the President on a full range of issues and decisions relating to the President's duties and the effective functioning of the Executive Branch. Mr. Lindsey often travels with the President as part of his duties. In his current position, Mr. Lindsey assists and advises the President on a wide variety of legal, political and policy matters, including such diverse issues as tobacco policy, international aviation, securities reform, labor disputes, and product liability. As Deputy Counsel, Mr. Lindsey also provides advice to the President on investigative matters, congressional relations, presidential appointments and judicial nominations.

(d) Ann Lewis

As Director of Communications for the White House, Ms. Lewis was primarily responsible for the planning and implementation of communications of the President's policies. She had regular contact with the President, which included both briefing and advising him on communications related matters. As Counselor to the President, Ms.

Lewis continues to have regular contact with the President, briefing and advising the President on a wide variety of domestic policy issues.

(e) Mike McCurry

As Press Secretary, Mr. McCurry was primarily responsible for conducting the daily press briefings on behalf of the President, including alerting the press and the public to important decisions and actions taken by the President. As part of Mr. McCurry's duties, he had frequent contact with the President, and he briefed the President and others in the White House on press inquiries and responses.

Interrogatory No. 3: Identify any and all communications you had with Craig Livingstone.

Response:

(a) Sidney Blumenthal

Mr. Blumenthal has never met Mr. Livingstone, nor had any communications with him.

(b) Rahm Emanuel

Prior to the start of this Administration, Mr. Livingstone worked on the Inaugural Committee, of which Mr. Emanuel was the head. Although Mr. Emanuel is sure that, on occasion, he exchanged greetings or pleasantries with Mr. Livingstone, and they may have attended some of the same meetings, he never sought out Mr. Livingstone for any purpose and cannot remember having any substantive conversations with Mr. Livingstone. Mr. Livingstone did not report directly to Mr. Emanuel.

During Mr. Livingstone's and Mr. Emanuel's tenure at the White House, Mr. Emanuel coordinated the events surrounding the signing of the Mideast peace agreement on September 13, 1993. Mr. Emanuel recalls vaguely that Mr. Livingstone assisted with this event, as did a number of other people. Again, although Mr. Emanuel may have exchanged greetings with Mr. Livingstone, Mr. Emanuel cannot recall any specific communications with him.

Otherwise, as a general matter, Mr. Emanuel recalls that he ran into Mr. Livingstone occasionally at the White House and would have exchanged greetings, but he cannot recall having any specific communications, meetings, or other contact with him. Mr. Emanuel did not communicate with Mr. Livingstone regarding anyone's FBI files, or about the FBI files matter generally.

(c) Bruce Lindsey

Mr. Lindsey first met Craig Livingstone during the 1992 presidential campaign, when Mr. Livingstone was doing advance work. Mr. Lindsey does not remember the substance of any conversations with Mr. Livingstone, although he does remember chatting with him outside a private home in the District of Columbia when then-Governor Clinton was inside meeting with Jesse Jackson. Mr. Lindsey does not remember any of the substance of that conversation.

Mr. Lindsey also communicated with Mr. Livingstone at one point during the 1993 Inauguration. Mr. Livingstone expressed his interest in becoming Head of the Military Office in the new administration. Mr. Lindsey listened to Mr. Livingstone, but did not respond substantively to him, nor take any action on his behalf.



Mr. Lindsey also had various communications with Mr. Livingstone during Mr. Livingstone's tenure as a White House employee. Other than pleasantries, Mr. Lindsey remembers discussing a security issue that arose during the events surrounding the signing of the Mideast peace agreement on September 13, 1993. Mr. Lindsey believes that Mr. Livingstone was assisting in the security for those events. Mr. Lindsey also had a conversation with Mr. Livingstone when Mr. Livingstone approached him about obtaining a salary adjustment. Again, other than listening to Mr. Livingstone's request, Mr. Lindsey does not remember taking any action on Mr. Livingstone's behalf. Mr. Lindsey also had conversations with Mr. Livingstone around the time of former Deputy Counsel Vince Foster's death, none of which related to the removal of documents from Mr. Foster's office.

Other than one background issue with respect to a then-current White House employee, Mr. Lindsey has never discussed FBI files, or any FBI information, with Mr. Livingstone.

EOP objects to this interrogatory on the basis of relevancy to the extent it seeks to discover conversations between Mr. Lindsey and Mr. Livingstone relating to Vince Foster's death, other than the removal of documents from Mr. Foster's office.

(d) Ann Lewis

To her knowledge, Ms. Lewis has never met Mr. Livingstone, nor had any communications with him.

(e) Mike McCurry

Mr. McCurry first met Craig Livingstone in the summer of 1988, when Mr. McCurry was the Director of Press and Communications for the

1988 Democratic National Convention in Atlanta. Mr. Livingstone was working on advance and security for the Chairman of that convention, Mr. Paul G. Kirk, Jr. Mr. McCurry remembers only brief and tangential contact with Mr. Livingstone about the mechanics of the convention, such as moving Chairman Kirk to various locations where he was scheduled for press interviews.

The next communication that Mr. McCurry remembers with Mr. Livingstone was in 1995, when Mr. McCurry was Press Secretary at the White House. Mr. Livingstone called Mr. McCurry to advise him that Mr. Chuck Easley from the White House Security Office would be coming to change the lock in Mr. McCurry's office.

The last communication that Mr. McCurry remembers with Mr. Livingstone was when Mr. Livingstone arranged for a Department of Energy official to give Mr. McCurry a security briefing for his security clearance. Mr. Livingstone accompanied the official to the briefing in Mr. McCurry's office, and stayed during the briefing. Mr. McCurry remembers no substantive conversation with Mr. Livingstone, other than thanking him for setting up the briefing.

Mr. McCurry remembers no other communications with Mr. Livingstone, although it is possible that they had incidental contact in the hallways of the White House, where they may have exchanged pleasantries. Mr. McCurry remembers no conversation with Mr. Livingstone about FBI files or FBI information.

Interrogatory No. 4: Please identify who was responsible for hiring Craig Livingstone.

Response:

(a) Sidney Blumenthal

Mr. Blumenthal does not know who was responsible for hiring Craig Livingstone.

(b) Rahm Emanuel

Mr. Emanuel does not know who was responsible for hiring Craig Livingstone.

(c) Bruce Lindsey

Mr. Lindsey does not know who was responsible for hiring Craig Livingstone.

(d) Ann Lewis

Ms. Lewis does not know who was responsible for hiring Craig Livingstone. Ms. Lewis was advised, however, probably by Jane Sherburne, that the First Lady was not responsible for the hiring of Mr. Livingstone.

(e) Mike McCurry

Mr. McCurry does not know who was responsible for hiring Craig Livingstone.

Interrogatory No. 5: Please state why Craig Livingstone was hired.

Response:

(a) Sidney Blumenthal

Mr. Blumenthal does not know why Craig Livingstone was hired.

(b) Rahm Emanuel

Mr. Emanuel does not know why Craig Livingstone was hired.

(c) Bruce Lindsey

Mr. Lindsey does not know why Craig Livingstone was hired.

(d) Ann Lewis

Ms. Lewis does not know why Craig Livingstone was hired.

(e) Mike McCurry

Mr. McCurry does not know why Craig Livingstone was hired.

Interrogatory No. 6: Identify any and all communications you had with Anthony Marceca.

Response:

(a) Sidney Blumenthal

Mr. Blumenthal has had no communications with Mr. Marceca.

(b) Rahm Emanuel

Mr. Emanuel has had no communications with Mr. Marceca

(c) Bruce Lindsey

Mr. Lindsey has had no communications with Mr. Marceca.

(d) Ann Lewis

Ms. Lewis has had no communications with Mr. Marceca.

(e) Mike McCurry

Mr. McCurry has had no communications with Mr. Marceca

Interrogatory No. 7: Please identify who was responsible for hiring Anthony Marceca.

Response:

(a) , Sidney Blumenthal

Mr. Blumenthal does not know who was responsible for hiring