

Interrogatory No. 16

Identify the source of your knowledge regarding the 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 described in your answer to the above Interrogatory.

Response:

(a) Sidney Blumenthal

See Response No. 42.

(b) Rahm Emanuel

See Response No. 15.

(c) Bruce Lindsey

See Response No. 15.

(d) Ann Lewis

See Response No. 15.

(e) Mike McCurry

See Response No. 15.

Interrogatory No. 17

Describe any and all knowledge you have about 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

Mr. Blumenthal has no knowledge about George Stephanopoulos' comments regarding the "Ellen Rometsch strategy" on the February 8, 1998 edition of ABC's "This Week" (Exhibit 2), other than the fact

that a purported transcript of certain of these comments was attached to Mr. Blumenthal's deposition notice sent to Mr. Blumenthal in this litigation.

(b) Rahm Emanuel

Although Mr. Emanuel had a number of conversations with Mr. Stephanopoulos around the time period of February 8, 1998, he did not speak to Mr. Stephanopoulos about his comments on "This Week" regarding an "Ellen Rometsch strategy." Mr. Emanuel has no knowledge about Mr. Stephanopoulos' comments in that regard, was not a source for those comments, and knows of no one who was a source.

(c) Bruce Lindsey

Mr. Lindsey has no knowledge about George Stephanopoulos' comments regarding the "Ellen Rometsch strategy" on the February 8, 1998 edition of ABC's "This Week" (Exhibit 2).

(d) Ann Lewis

Ms. Lewis has no knowledge about the referenced comments by Mr. Stephanopoulos, other than any reports there may have been about such comments in the press. The subject of Mr. Stephanopoulos' comments did come up at a meeting with Sally Paxton of the White House Counsel's Office and Elizabeth Shapiro of the Department of Justice, sometime around the time Ms. Lewis's deposition was originally noticed in this litigation. Ms. Lewis also met on a separate occasion with Ms. Paxton and Allison Giles of the Department of Justice, although Ms. Lewis cannot remember the topics discussed at that meeting. The excerpts of the transcript of Mr. Stephanopoulos's

comments were attached to Ms. Lewis's deposition notice in this litigation.

EOP objects to Interrogatory No. 17 on the basis of attorney-client privilege, to the extent that it seeks to discover the substance of the communications between Ms. Lewis, Ms. Paxton and Ms. Shapiro, and between Ms. Lewis, Ms. Paxton and Ms. Giles.

(e) Mike McCurry

Mr. McCurry has no knowledge about the referenced comments by Mr. Stephanopoulos. The subject of Mr. Stephanopoulos' comments did come up at a meeting with Sally Paxton of the White House Counsel's Office, and Elizabeth Shapiro of the Department of Justice, sometime around the time Mr. McCurry's deposition was originally noticed in this litigation. The excerpts of the transcript of Mr. Stephanopoulos's comments were attached to Mr. McCurry's deposition notice in this litigation.

EOP objects to Interrogatory No. 17 on the basis of attorney-client privilege, to the extent that it seeks to discover the substance of the communications between Mr. McCurry, Ms. Paxton and Ms. Shapiro.

Interrogatory No. 18

Identify the source of your knowledge regarding George Stephanopoulos' comments regarding the "Ellen Rometsch strategy" on the February 8, 1998 edition of ABC's "This Week" (Exhibit 2) described in your answer to the above Interrogatory.

Response:

(a) Sidney Blumenthal

Not applicable (see Response No. 17).

(b) Rahm Emanuel

Not applicable (see Response No. 17).

(c) Bruce Lindsey

Not applicable (see Response No. 17).

(d) Ann Lewis

Not applicable (see Response No. 17).

(e) Mike McCurry

Not applicable (see Response No. 17).

Interrogatory No. 19

Describe any and all activities in which you engaged, or were asked to engage, relating to the use of FBI background investigation files, or summary reports, or raw data on persons included in the attached list (Exhibit 1) or the White House's response thereto.

Response:

(a) Sidney Blumenthal

None.

(b) Rahm Emanuel

None.

(c) Bruce Lindsey

Mr. Lindsey's only activities surrounding 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. 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.

EOP objects to Interrogatory No. 19 to the extent it seeks to discover "any and all activities" 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 "any and all activities" 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

Ms. Lewis did not engage, and was not asked to engage, in any such activities, other than, in her capacity as Deputy Director of the Clinton/Gore '96 campaign, to respond to allegations in the press. In that capacity, Ms. Lewis also addressed such allegations in newsletters under her name in June 1996, addressed to Friends of the Clinton/Gore 1996 Campaign, in which she explained that the transfer of the files was an unfortunate mistake.

(e) Mike McCurry

In the course of Mr. McCurry's official duties as Press Secretary, he responded to media inquiries to the White House regarding the circumstances of the White House's acquisition of FBI summary reports on persons who no longer needed access to the White

House. Mr. McCurry did not engage, and was not asked to engage, in any other activities related to the subject matter of this interrogatory.

Interrogatory No. 20

Describe any and all activities in which you were engaged, or were asked to engage, relating to the obtaining of FBI files of former White House travel Office Employees Billy Ray Dale, John Dreylinger, Barney Brasseur, Ralph Maughan, Robert Van Eimeren, John McSweeney, or Gary Wright, or the White House's response thereto.

Response:

(a) Sidney Blumenthal

None.

(b) Rahm Emanuel

None.

(c) Bruce Lindsey

None.

(d) Ann Lewis

None, except to the extent that the obtaining of Mr. Dale's summary report was encompassed within the FBI files matter generally.

See Response No. 19.

(e) Mike McCurry

Of the names listed in Interrogatory No. 20, Mr. McCurry only recognizes the name of Billy Dale. In the course of Mr. McCurry's official duties as Press Secretary, he responded to media inquiries to the White House regarding the circumstances of the White House's acquisition of Mr. Dale's FBI summary report, and the summary reports

of other persons who no longer needed access to the White House. Mr. McCurry did not engage, and was not asked to engage, in any other activities related to the subject matter of this interrogatory.

Interrogatory No. 21

Describe any and all activities in which you were engaged, or were asked to engage, relating to release or use of information from Linda Tripp's Department of Defense files, or the White House's response thereto.

Response:

(a) Sidney Blumenthal

None.

(b) Rahm Emanuel

None.

(c) Bruce Lindsey

None.

(d) Ann Lewis

None.

(e) Mike McCurry

In the course of Mr. McCurry's official duties as Press Secretary, he may have responded to media inquiries to the White House regarding allegations of a White House role in the release of information from Linda Tripp's Department of Defense file. Mr. McCurry would have responded that the White House had no role in the DoD's release of any information about Ms. Tripp.

Mr. McCurry did not engage, and was not asked to engage, in any other activities related to the subject matter of this interrogatory.

See also Response No. 13.

Interrogatory No. 22

Describe any and all activities in which you were engaged, or were asked to engage, 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 to Interrogatory No. 42.

(b) Rahm Emanuel

See Response to Interrogatory No. 15.

(c) Bruce Lindsey

See Response to Interrogatory No. 15.

(d) Ann Lewis

Ms. Lewis appeared on ABC's Nightline on March 17, 1998. Ted Koppel asked about the purpose of releasing the letters. Ms. Lewis's response was that it was information that ought to be on the public record in order to put Ms. Willey's statements in context. Ms. Lewis did not engage, and was not asked to engage, in any other activities related to the subject matter of this interrogatory. See Response to Interrogatory No. 15.

(e) Mike McCurry

Mr. McCurry, in the course of his official duties as Press Secretary, responded to media inquiries to the White House regarding why the White House released Ms. Willey's letters to the President.

Mr. McCurry responded that the reason for the release was to provide context for Ms. Willey's "60 Minutes" appearance. Mr. McCurry did not engage, and was not asked to engage, in any other activities related to the subject matter of this interrogatory. See also Response No. 15.

Interrogatory No. 23

Describe any and all activities in which you were engaged, or were asked to engage, 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, other than plaintiffs' request in this litigation to depose Mr. Blumenthal on the subject of Mr. Stephanopoulos's comments.

(b) Rahm Emanuel

None.

(c) Bruce Lindsey

None.

(d) Ann Lewis

None, other than plaintiffs' request in this litigation to depose Ms. Lewis on the subject of Mr. Stephanopoulos's comments.

(e) Mike McCurry

None, other than plaintiffs' request in this litigation to depose Mr. McCurry on the subject of Mr. Stephanopoulos's comments.

Interrogatory No. 24

Identify any and all communications you had with Bernard Nussbaum 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

See Response No. 34.

(d) Ann Lewis

None.

(e) Mike McCurry

None.

Interrogatory No. 25

Identify any and all communications you had with Bernard Nussbaum relating to the obtaining of the FBI files of former White House travel Office employees Billy Ray Dale, John Dreylinger, Barney Brasseur, 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. 26

Identify any and all communications you had with Bernard Nussbaum 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. 27

Identify any and all communications you had with Bernard Nussbaum 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

None.

(b) Rahm Emanuel

None:

(c) Bruce Lindsey

None.

(d) Ann Lewis

None.

(e) Mike McCurry

None.

Interrogatory No. 28

Identify any and all communications you had with Bernard Nussbaum 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