

or what specifically was discussed.

EOP objects to Interrogatory No. 37 to the extent it seeks to discover the substance of communications protected by the deliberative process privilege, the attorney-client privilege, and the attorney work product doctrine.

(d) Ann Lewis

See Response No. 15.

(e) Mike McCurry

Mr. McCurry believes that there may have been a meeting or meetings, in which he did not participate, regarding whether to release Ms. Willey's correspondence with the President subsequent to her appearance on CBS's "60 Minutes." Mr. McCurry does not know precisely when or where such a meeting would have occurred, who attended, or what was said.

There also may have been meetings regarding the White House's public response to the release of the letters, but Mr. McCurry is unaware of any details, other than the message which he communicated to the press in response to press inquiries. See also Response No. 15, 22.

Interrogatory No. 38

Identify any and all meetings in which you participated, or of which you are aware, relating to George Stephanopoulos' comments on the "Ellen Rometsch strategy" on the February 8, 1998 edition of ABC's "This Week" (Exhibit 2), 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

See Response No. 17.

(c) Bruce Lindsey

None.

(d) Ann Lewis

See Response No. 17.

(e) Mike McCurry

See Response No. 17.

Interrogatory No. 39

Identify any and all communications you had 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 each communication; (b) whether the communication was oral, in writing, or by electronic means; (c) the identity of each person who participated in the communication; (d) what was stated by each individual; (e) if a conversation, whether the conversation took place in person or by telephone; and (f) the location of the conversation, including, if the conversation took place by telephone in the White House, the telephone extension that was used.

Response:

(a) Sidney Blumenthal

See Response No. 46. Mr. Blumenthal also had a conversation with Ms. Sally Paxton of the White House Counsel's office regarding the allegations of this lawsuit. The date of that conversation was after the time Mr. Blumenthal's 1998 deposition notice was issued, and prior to the filing of Mr. Blumenthal's declaration in this case.

The conversation was by telephone, and the only participants were Mr. Blumenthal and Ms. Paxton. Mr. Blumenthal does not remember where he was at the time of the conversation.

EOP objects to Interrogatory No. 39, subpart (d), on the basis of attorney-client privilege, to the extent that it seeks to discover the substance of the conversation between Mr. Blumenthal and Ms. Paxton.

(b) **Rahm Emanuel**

None.

(c) **Bruce Lindsey**

See Response No. 34.

(d) **Ann Lewis**

None, other than those referenced in Response Nos. 19 and 34, and communications to the media, described in Response No. 47.

(e) **Mike McCurry**

See Response No. 34. In the course of Mr. McCurry's official duties as Press Secretary, he responded to numerous media inquiries to the White House regarding the circumstances of the White House's acquisition of FBI files on persons who no longer needed access to the White House. The dates of such communications were primarily in June and July, 1996, after the FBI files matter became public. The media inquiries were both oral, in person, during daily press briefings, and by telephone. Press briefings were held in the press briefing room in the West Wing; telephone conversations would have probably taken place in Mr. McCurry's West Wing White House office

(456-1414). Mr. McCurry does not recall the identity of other persons who participated in such conversations or the specifics of such conversations, except that the inquiries came from members of the media.

Defendant EOP objects to this interrogatory as overbroad and unduly burdensome to the extent it seeks a cataloging of all press communications by Mr. McCurry, who was Press Secretary at the time. The transcripts of the daily afternoon press briefings are publicly available, and the substance of other briefings and media communications, as reported in the media, are also publically available.

Interrogatory No. 40

Identify any and all communications you had 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 including in your answer: (a) the date of each communication; (b) whether the communication was oral, in writing, or by electronic means; (c) the identity of each person who participated in the communication; (d) what was stated by each individual, and (e) if a conversation, whether the conversation took place in person or by telephone; and (f) the location of the conversation, including, if the conversation took place by telephone in the White House, the telephone extension that was used.

Response:

(a) Sidney Blumenthal

See Response No. 47

(b) Rahm Emanuel

None.

(c) Bruce Lindsey

None.

(d) Ann Lewis

None, other than possible media appearances that referenced Billy Dale in the context of the FBI files matter generally, when that matter broke in the press in June 1996. See also Response Nos. 39, 46, 47.

(e) Mike McCurry

Of the names listed in this Interrogatory, Mr. McCurry only recognizes Billy Dale. With respect to Mr. Dale, see Response No. 39.

Interrogatory No. 41

Identify any and all communications you had relating to release or use of information from Linda Tripp's Department of Defense Files, including in your answer: (a) the date of each communication; (b) whether the communication was oral, in writing, or by electronic means; (c) the identity of each person who participated in the communication; (d) what was stated by each individual, and (e) if a conversation, whether the conversation took place in person or by telephone; and (f) the location of the conversation, including, if the conversation took place by telephone in the White House, the telephone extension that was used.

Response:

(a) Sidney Blumenthal

See Response No. 48.

(b) Rahm Emanuel

None.

(c) Bruce Lindsey

Although Mr. Lindsey cannot recall specific communications on this subject, 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, it should refer the matter to DoD for a response.

(d) Ann Lewis

None.

(e) Mike McCurry

See Response No. 13. 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 DoD's release of Ms. Tripp's information. The date of such communications would have been shortly after Jane Mayer's *New Yorker* article about Ms. Tripp was published. Mr. McCurry does not recall whether any such communications were oral, in person, during a daily press briefing, or by telephone. Press briefings were held in press briefing room; a telephone conversation would have probably taken place in Mr. McCurry's West Wing office (456-1414). Mr. McCurry does not recall the identity of other persons who participated in any such conversations or what was stated by other participants, except that the inquiry came from members of the media.

Defendant EOP objects to this interrogatory as overbroad and unduly burdensome to the extent it seeks a cataloging of all press

communications by Mr. McCurry, who was Press Secretary at the time. The transcripts of the daily afternoon press briefings are publicly available, and the substance of other briefings and media communications, as reported in the media, are also publically available.

As stated in Response No. 13, Mr. McCurry also recalls being informed by his deputy Joe Lockhart that Mr. Lockhart had received a telephone call about Linda Tripp from Jane Mayer of *The New Yorker*, and that Mr. Lockhart referred Ms. Mayer to the Department of Defense. Mr. McCurry does not recall specifically what was stated by Mr. Lockhart or himself. The date of the conversation was shortly before the *New Yorker* article was published. The conversation was oral, in person, and took place either in Mr. McCurry's office or in Mr. Lockhart's office in the West Wing. Mr. McCurry does not recall that there were any other participants. In addition, as relayed to the press in response to a question at a public briefing, Mr. McCurry had a telephone conversation with Ken Bacon, subsequent to the publication of *The New Yorker* article, in which Mr. McCurry advised Mr. Bacon that the White House would not be commenting on the matter.

Interrogatory No. 42

Identify any and all communications you had 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 each communication; (b) whether the communication was oral, in writing, or by electronic means; (c) the identity of each person who participated in the communication; (d) what was stated by each individual; (e) if a

conversation, whether the conversation took place in person or by telephone; and (f) the location of the conversation, including if the conversation took place by telephone in the White House, the telephone extension that was used.

Response:

(a) Sidney Blumenthal

Prior to the "60 Minutes" broadcast on March 15, 1998, Mr. Blumenthal, who was generally aware of the existence of the Willey letters, remembers having had conversations with senior White House staff about the letters. Mr. Blumenthal cannot recall with whom he had these conversations, nor precisely when.

On or about March 14, 1998, Mr. Blumenthal left on an official trip to Puerto Rico. While in Puerto Rico, on March 16, 1998, Mr. Blumenthal spoke to Mrs. Clinton by telephone. Mr. Blumenthal recalls that he and Mrs. Clinton discussed Ms. Willey's letters to the President, and that the letters were inconsistent with what Ms. Willey had said on "60 Minutes." Both Mrs. Clinton and Mr. Blumenthal agreed that the letters should be released.

That same day, March 16, 1998, Mr. Blumenthal telephoned Ms. Jill Abramson, a reporter for *The New York Times*. Mr. Blumenthal was not able to reach Ms. Abramson, but left her a voice-mail message. In that message, as best he can recall, Mr. Blumenthal stated that Ms. Willey had written letters to the President that were inconsistent with Ms. Willey's statements on "60 Minutes."

The next day, March 17, 1998, Mr. Blumenthal learned from a newspaper in Puerto Rico that the White House had released the Willey

letters to the media the preceding day. Mr. Blumenthal was not involved in the White House decision to release the letters, and attended no meetings about that matter.

Shortly after Mr. Blumenthal first received a copy of these interrogatories, Mr. Blumenthal telephoned Ms. Abramson. In that telephone conversation, Mr. Blumenthal told Ms. Abramson about the interrogatories and told her that he would mention his March 1998 conversation with Ms. Abramson in his response to the interrogatories. Ms. Abramson said she understood that Mr. Blumenthal would do so.

On July 12, 1999, Mr. Blumenthal again spoke with Ms. Abramson by telephone. Mr. Blumenthal reminded Ms. Abramson that he was about to submit answers to these interrogatories. Ms. Abramson said that, as she remembered it, Mr. Blumenthal and she had first talked about the Willey letters the day the White House released the letters. Ms. Abramson said that if she had known about the letters before that time, she would have written about them, but that because Mr. Blumenthal's voice-mail message had come to her attention after the release of the letters, the message had no news value to her. See also Response No. 49.

EOP objects to Interrogatory No. 42 to the extent it seeks to discover the substance of the discussions between Mr. Blumenthal and senior White House staff regarding the Willey letters on the basis of the deliberative process privilege.

(b) **Rahm Emanuel**

See Response Nos. 15, 37 and 49. Mr. Emanuel also received a telephone call from the President on the night of the "60 Minutes" interview. Mr. Emanuel was at a dinner party at the home of friends at the time of the call. Mr. Emanuel recalls that the President, among other topics, referred to the Willey interview. It is possible that they discussed the Willey letters during that conversation, although Mr. Emanuel does not remember doing so.

(c) **Bruce Lindsey**

See Response Nos. 15 and 37. During the weekend of the "60 Minutes" interview, Mr. Lindsey had many communications with Mr. Ruff and Ms. Mills. These communications were in person, in the White House. Mr. Lindsey does not remember specifics, but the general subject matter is described in Response Nos. 15 and 37.

EOP objects to Interrogatory No. 42 to the extent it seeks to discover the substance of communications protected by the deliberative process privilege, the attorney-client privilege, and the attorney work product doctrine.

(d) **Ann Lewis**

See Response Nos. 15, 22.

(e) **Mike McCurry**

See Response Nos. 15, 22 & 37.

Interrogatory No. 43

Identify any and all communications you had relating to George

Stephanopoulos' comments on the "Ellen Rometsch strategy" on the February 8, 1998 edition of ABC's "This Week" (Exhibit 2), including in your answer: (a) the date of each communication; (b) whether the communication was oral, in writing, or by electronic means; (c) the identity of each person who participated in the communication; (d) what was stated by each individual; (e) if a conversation, whether the conversation took place in person or by telephone; and (f) the location of the conversation, including if the conversation took place by telephone in the White House, the telephone extension that was used.

Response:

(a) Sidney Blumenthal

None, other than a conversations with Sally Paxton of the White House Counsel's office regarding the notice for Mr. Blumenthal's deposition in this case. See also Response Nos. 39, 50.

EOP objects to Interrogatory No. 43, subpart (d), on the basis of attorney-client privilege, to the extent that it seeks to discover the substance of the conversation between Mr. Blumenthal and Ms. Paxton.

(b) Rahm Emanuel

See Response Nos. 17 and 23.

(c) Bruce Lindsey

None.

(d) Ann Lewis

See Response Nos. 17 and 23.

(e) Mike McCurry

See Response Nos. 17 and 23.

Interrogatory No. 44

With regard to George Stephanopoulos' reference to the "Ellen

Rometsch strategy" on the February 8, 1998 edition of ABC's "This Week" (Exhibit 2), identify: (a) who Mr. Stephanopoulos was referring to when he said "White House allies"; (b) any person who would know who Mr. Stephanopoulos was referring to when he said "White House allies"; (c) the dates and locations of any communications regarding the "White House allies"; (d) what was said by whom in those communications; (e) any other person present at the discussion; (f) any other oral or written communications referring to Mr. Stephanopoulos' statements; and (g) any documents or writings created as a result of the discussion or communications.

Response:

(a) Sidney Blumenthal

Mr. Blumenthal has no knowledge or information about (a) - (g), other than his knowledge that the transcript of Mr. Stephanopoulos's comments was attached to Mr. Blumenthal's deposition notice in this litigation.

(b) Rahm Emanuel

Mr. Emanuel has no knowledge or information about (a) - (g).

(c) Bruce Lindsey

Mr. Lindsey has no knowledge or information about (a)-(g).

(d) Ann Lewis

Ms. Lewis has no knowledge or information about (a) or (b). The only knowledge she has related to (c) - (g) is Ms. Lewis's conversation with Ms. Paxton and Ms. Shapiro in connection with this litigation, and the transcript that was attached to her deposition notice in this litigation. See Response Nos. 17, 38, 43.

(e) Mike McCurry

Mr. McCurry has no knowledge or information about (a) or (b). The only knowledge that Mr. McCurry has related to (c) - (g) is Mr.