

McCurry's communication with Ms. Paxton and Ms. Shapiro in connection with this litigation, and the transcript of Mr. Stephanopoulos's comments attached to Mr. McCurry's deposition notice in this litigation. See Response Nos. 17, 38, 43.

Interrogatory No. 45

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 "some around him [the President] are willing to take everybody down with him"; (b) any person who would know who Mr. Stephanopoulos was referring to when he said "some around him [the President]"; (c) the dates and locations of any communications regarding Mr. Stephanopoulos' reference to "some around him [the President]"; (d) what was said by whom in those communications; (e) any other person present at the discussion; and (f) any documents or writings created as a result of the communication.

Response:

(a) Sidney Blumenthal

Mr. Blumenthal has no knowledge or information about (a)-(f).

(b) Rahm Emanuel

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

(c) Bruce Lindsey

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

(d) Ann Lewis

Ms. Lewis has no knowledge or information about (a)-(f).

(e) Mike McCurry

Mr. McCurry has no knowledge or information about (a)-(f).

Interrogatory No. 46

Identify any and all communication you had with members of the press and/or media 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**

EOP objects to this interrogatory on the basis of relevance and overbreadth to the extent that it requests information about communications between Mr. Blumenthal and members of the media that occurred prior to Mr. Blumenthal's employment at the White House. Mr. Blumenthal was a journalist prior to his employment at the White House and would have had conversations about a variety of matters in the public domain.

Since beginning his employment at the White House, Mr. Blumenthal does not recall having had any communications with any members of the media about this matter, although it is possible that he has had such communications. Many of Mr. Blumenthal's friends are members of the media. Mr. Blumenthal and those friends speak frequently about matters that appear in the press. Mr. Blumenthal would not have discussed anything with these persons other than what has appeared in the public media.

(b) **Rahm Emanuel**

None.

(c) **Bruce Lindsey**

None.

(d) **Ann Lewis**

With regard to the mistaken obtaining of FBI summary reports

generally, Ms. Lewis appeared on ABC's "Nightline" (June 10, 1996), on which Cokie Roberts was the moderator to discuss this issue; "Inside Politics" (June 9, 1996), on which Wolf Blitzer was the moderator; and "Inside Politics" (June 29, 1996), on which Gene Randall was the anchor. Ms. Lewis may have spoken with others in the media about this issue, but the above is all that she can recall.

(e) Mike McCurry

See Response Nos. 19, 39

Interrogatory No. 47

Identify any and all communication you had with members of the press and/or media 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.

Response:

(a) Sidney Blumenthal

See Response No. 46.

(b) Rahm Emanuel

None.

(c) Bruce Lindsey

None.

(d) Ann Lewis

None, except to the extent the obtaining of Billy Dale's summary report was included in the FBI files matter generally. See Response No. 46.

(e) Mike McCurry

Of the names listed in this Interrogatory, Mr. McCurry only recognizes Billy Dale. With respect to Mr. Dale, see Response Nos. 20, 40.

Interrogatory No. 48

Identify any and all communications you had with members of the press and/or media relating to release or use of information from Linda Tripp's Department of Defense files.

Response:

(a) Sidney Blumenthal

Mr. Blumenthal does not recall having had any communications with any members of the media about this matter, although it is possible that he has had such communications. Many of Mr. Blumenthal's friends are members of the media. Mr. Blumenthal and those friends speak frequently about matters that appear in the press. Mr. Blumenthal would not have discussed anything with these persons other than what has appeared in the public media.

(b) Rahm Emanuel

None.

(c) Bruce Lindsey

None.

(d) Ann Lewis

None.

(e) Mike McCurry

See Response Nos. 21, 41.

Interrogatory No. 49

Identify any and all communications you had with members of the press and/or media 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 No. 42. Mr. Blumenthal does not recall having had any other communications with any members of the media about this matter, although it is possible that he has had such communications. Many of Mr. Blumenthal's friends are members of the media. Mr. Blumenthal and those friends speak frequently about matters that appear in the press. Mr. Blumenthal would not have discussed anything with these persons other than what has appeared in the public media.

(b) Rahm Emanuel

The only documents referenced in Interrogatory No. 49 of which Mr. Emanuel is aware are the letters from Ms. Willey to the President that were publicly released in March, 1998. Mr. Emanuel recalls receiving a number of media calls about the "60 Minutes" interview after CBS began airing promotions for the interview. Mr. Emanuel may have addressed the issue of Ms. Willey's credibility in response to these inquiries. It is also possible that he discussed with reporters the letters Ms. Willey had written after they had already been released, but he has no recollection of having done so.

(c) Bruce Lindsey

None.

(d) Ann Lewis

Although Ms. Lewis spoke to the press several times about the fact that Ms. Willey was interested in, and approached Ms. Lewis about, working on President Clinton's 1996 campaign, she can recall speaking to the press about the Willey letters on only one occasion. On ABC's Nightline (March 17, 1998), she responded to a question by Ted Koppel on why the letters were released. See Response No. 22.

(e) Mike McCurry

See Response Nos. 22, 42.

Interrogatory No. 50

Identify any and all communications you had with members of the press and/or media relating to George Stephanopoulos' comments on the "Ellen Rometsch strategy" on the February 8, 1998 edition of ABC's "This Week" (Exhibit 2).

Response:

(a) Sidney Blumenthal

Mr. Blumenthal does not recall having had any communications with any members of the media about this matter, although it is possible that he has had such communications. Many of Mr. Blumenthal's friends are members of the media. Mr. Blumenthal and those friends speak frequently about matters that appear in the press. Mr. Blumenthal would not have discussed anything with these persons other than what has appeared in the public media.

(b) Rahm Emanuel

None.

(c) Bruce Lindsey

None.

(d) Ann Lewis

None.

(e) Mike McCurry

Mr. McCurry recalls no such conversations.

Interrogatory No. 51

Please state why Bernard Nussbaum's name appears on the requisition forms for the FBI Files, and if you claim Nussbaum was not responsible for placing his own name on the requisition forms, then please state who was responsible.

Response:

(a) Sidney Blumenthal

Mr. Blumenthal has no knowledge about why Mr. Nussbaum's name appears on requisition forms for FBI information.

(b) Rahm Emanuel

Mr. Emanuel has no knowledge about why Mr. Nussbaum's name appears on requisition forms for FBI information.

(c) Bruce Lindsey

Mr. Lindsey's understanding is that as Counsel, and head of the Counsel's Office, the requisition forms went out under Mr. Nussbaum's name.

(d) Ann Lewis

Ms. Lewis does not know why Mr. Nussbaum's name appears on the requisition forms, although she believes she read somewhere that the

White House Counsel's name is traditionally typed on such forms.

**(e) Mike McCurry**

Mr. McCurry does not know personally why Mr. Nussbaum's name appears on the requisition forms. Mr. McCurry learned from Mr. Quinn and/or public sources that the standard practice from previous administrations was to use a template requisition form on which the White House Counsel's name would appear as a matter of course.

**Interrogatory No. 52**

Identify any and all communications and/or meetings you had with Cody Shearer.

**Response:**

**(a) Sidney Blumenthal**

Mr. Blumenthal has been friends with Mr. Shearer for nearly 30 years, and has had numerous conversations with him over that time. Mr. Blumenthal speaks regularly with Mr. Shearer about public affairs and matters in the public domain. Thus, while Mr. Blumenthal has no recollection of any conversations with Mr. Shearer relevant to the subject matter of these interrogatories, he cannot rule out conversations about matters reported in the public press.

EOP objects to Interrogatory No. 52 as overbroad and unduly burdensome to the extent it seeks a cataloging of communications which are not relevant to the subject matter of this litigation.

**(b) Rahm Emanuel**

Mr. Emanuel is acquainted with Mr. Shearer from the 1992 campaign, but has had no communications whatsoever with him on the



subjects of these interrogatories.

(c) **Bruce Lindsey**

Mr. Lindsey knows Mr. Shearer from the 1992 campaign, and may have spoken with him on occasion since that time. Mr. Lindsey does not, however, remember any specific conversations, other than that described below.

Mr. Shearer called Mr. Lindsey approximately one month ago, while Mr. Lindsey was in Los Angeles. Mr. Shearer advised Mr. Lindsey that someone had broken into Mr. Shearer's home, slashed his car tires, and pulled a gun on several individuals. Mr. Shearer further told Mr. Lindsey that he was able to get the license plate number of the car in which the vandal escaped, and that he had provided that information to the police. The police identified the vandal as Pat Buchanan's brother.

(d) **Ann Lewis**

None.

(e) **Mike McCurry**

None.

Interrogatory No. 53

Identify any and all communications and/or meetings you had with Terry Lenzner, Larry Potts, and/or Investigative Group International.

Response:

(a) **Sidney Blumenthal**

Mr. Blumenthal has had no communications or meetings with Mr. Potts or IGI. Mr. Blumenthal has met Mr. Lenzner once, in the

hallway of the District Court while waiting to testify before the Lewinsky grand jury. They exchanged greetings, and Mr. Blumenthal has neither seen nor spoken to Mr. Lenzner since.

(b) Rahm Emanuel

None.

(c) Bruce Lindsey

Mr. Lindsey may have met Mr. Lenzner in passing, but has never had a substantive conversation with him.

(d) Ann Lewis

Ms. Lewis has met and spoken with Mr. Lenzner over the years at social occasions. She has never spoken to him, however, about the obtaining or use of anyone's FBI file, about Mr. Stephanopoulos' comments on the Feb. 8, 1998 edition of ABC's "This Week," about the release by the White House of any documents pertaining to Kathleen Willey, or the release of information from Linda Tripp's DoD file. She has not had any communications with Larry Potts or with Investigative Group International.

(e) Mike McCurry

None.

Dated: July 16, 1999

As to Objections,

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