

(James Gilligan, Elizabeth Shapiro, Allison Giles and Timothy Garren) interviewed several past and present EOP employees, and that Ms. Sally Paxton, formerly Special Associate Counsel to the President, attended many of those interviews. In addition, EOP provided attorneys for the Department of Justice access to all documents produced to the House of Representatives, the Senate and the Office of Independent Counsel in response to those entities' investigation of the FBI files matter.

The Department of Justice has provided to plaintiffs a list of all the people its attorneys interviewed, and the documents they reviewed, in conjunction with the certification determination. See Exhibit 4 to the Deposition of Helene Goldberg.

INTERROGATORY NO. 18: Describe with specificity, all of your knowledge about the removal of FBI files of the persons listed on Exhibit 1 from Vincent Foster's office or the White House Counsel's suite during the week after his death.

RESPONSE: EOP objects to this interrogatory as irrelevant to the extent it seeks to include persons who were current Clinton administration employees. EOP further objects to the term "removal" as vague and ambiguous. In addition, EOP objects to the inclusion in this interrogatory of "the White House Counsel's suite," as overbroad and posing an undue burden on EOP which outweighs any likely benefit. It is not possible, for example, to know what documents may have been anywhere in the White House Counsel's suite during one week in July 1993.

Subject to the objection stated above, EOP has no knowledge of

FBI summary reports, or information contained therein, of persons listed on Exhibit 1 being removed from Vincent Foster's office or the White House Counsel's suite during the week after Mr. Foster's death.

Dated: July 16, 1999

As to Objections,

DAVID W. OGDEN
Acting Assistant Attorney General

PHILIP D. BARTZ
Deputy Assistant Attorney General

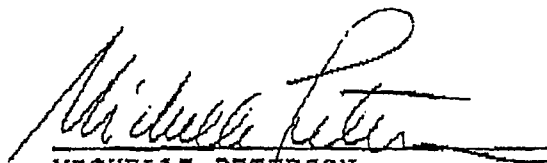


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(202) 514-5302

Counsel for Defendant EOP

VERIFICATION

I hereby declare under penalty of perjury that the foregoing answers to interrogatories are true and correct based on information provided to me in my official capacity as counsel in this matter for defendant Executive Office of the President.

A handwritten signature in cursive script, appearing to read "Michelle Peterson", written over a horizontal line.

MICHELLE PETERSON
Associate Counsel to the
President

EXHIBIT 57

MEMORANDUM

TO: ARNOLD A. COLE
ASTAIC, ACCESS

FROM: CRAIG LIVINGSTONE
-DIRECTOR OF WHITE HOUSE PERSONNEL SECURITY

RE: RESTRICTED ACCESS

DATE: May 19, 1993

Please place the following people on restricted access. They are restricted from gaining access to the White House Complex without the written authorization of Mr. David Watkins, Assistant to the President for Administration and Management.

Thank you.

<u>RECEIVED</u>	<u>Name:</u>	<u>Rec #</u>	<u>SS#:</u>	<u>DOB:</u>	<u>Tracking</u>
<i>NO</i>	Brasseux, Barnaby L.	<i>-</i>			<i>YES</i>
<i>2/1/94</i>	Dale, Billy R.	<i>1</i>			<i>NO</i>
<i>2/1/94</i>	Dreylinger, John P.	<i>1</i>			<i>NO</i>
	Maughan, Ralph T.				<i>NO</i>
	McSweeney, Richard				<i>NO</i>
	Van Eimeren, Robert S.				<i>NO</i>
	Wright, Gary D.				<i>NO</i>

cc: David Watkins
William Kennedy

EXHIBIT 58