



- B. In November 2010, Secretary Clinton and her Deputy Chief of Staff for Operations discussed the fact that Secretary Clinton's emails to Department employees were not being received. The Deputy Chief of Staff emailed the Secretary that "we should talk about putting you on state email or releasing your email address to the department so you are not going to spam." In response, the Secretary wrote, "Let's get separate address or device but I don't want any risk of the personal being accessible." *See id.* at 38.
- C. In another email exchange, the Director of S/ES-IRM noted that an email account and address had already been set up for the Secretary and also stated that "you should be aware that any email would go through the Department's infrastructure and subject to FOIA searches." *See id.* at 38-39.
- D. OIG reviewed emails showing communications between Department staff and both individuals concerning operational issues affecting the Secretary's email and server from 2010 through at least October 2012. *See id.* at 39.
- E. On January 9, 2011, the non-Departmental advisor to President Clinton who provided technical support to the Clinton email system notified the Secretary's Deputy Chief of Staff for Operations that he had to shut down the server because he believed "someone was trying to hack us and while they did not get in i didnt [sic] want to let them have the chance to." Later that day, the advisor again wrote to the Deputy Chief of Staff for Operations, "We were attacked again so I shut [the server] down for a few min." On January 10, the Deputy Chief of Staff for Operations emailed the Chief of Staff and the Deputy Chief of Staff for Planning and instructed them not to email the Secretary "anything sensitive" and stated that she could "explain more in person." *See id.* at 40.

4. Defendant has agreed to produce the above-identified documents to Plaintiff by June 21, 2016, reserving its right to make appropriate redactions.

WHEREFORE, Plaintiff respectfully requests that the Court grant its request that Defendant produce the documents identified above to Plaintiff, with any appropriate redactions, by June 21, 2016.

Dated: June 13, 2016

Respectfully submitted,

/s/ Michael Bekesha

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