

to apply and identify all information sufficient to permit Plaintiff to contest the claim of privilege and to permit the Court to reach a determination concerning the validity of the claim of privilege, together with the factual and legal basis for the claim of privilege.

### **INTERROGATORIES**

1. Describe with specificity each conversation you had with Bryan Pagliano concerning the setup of the "clintonemail.com" system that hosted Secretary Clinton's and Ms. Abedin's "clintonemail.com" email accounts, including, to the extent such issues were discussed, any and all server(s) used for the system and accounts, when the servers and accounts were set up, who set them up, where they were set up, how they were set up, and why they were set up. Also include in your answer, when each conversation took place, names of all persons present during each conversation, method of communication (whether in person or otherwise) and the approximate duration of each conversation. You may limit your answer to the time period after you left the State Department on or around February 1, 2013.

#### **Response:**

I recall having conversations with Bryan Pagliano, which I believe were by telephone, in three time periods following February 2013:

- 1) In or around March 2013, when the email account of Sidney Blumenthal was compromised by a hacker known as Guccifer. As I recall, these discussions involved whether this event might affect Secretary Clinton's email;
- 2) In or around Spring 2013, during the transition to Platte River Networks. As I recall, these discussions were in the context of contract negotiations with Platte River Networks and involved how the needs of the clintonemail.com system would be met by the services proposed by Platte River Networks; and
- 3) In and or around Summer or Fall 2014, when we were seeking to gather Secretary Clinton's emails to provide those that were work-related to the Department of State. As I recall, these discussions involved whether Platte River Networks would have the technical capacity and be the appropriate source from which to gather Secretary Clinton's email from the clintonemail.com system.