

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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)	
JUDICIAL WATCH, INC.,)	
)	
Plaintiffs,)	Civil Action No. 14-cv-1242 (RCL)
)	
v.)	
)	
U.S. DEPARTMENT OF STATE,)	
)	
Defendant.)	
)	

**OBJECTIONS AND RESPONSES OF NON-PARTY BENJAMIN RHODES TO
PLAINTIFF’S INTERROGATORIES**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure (the “Rules”) and the Court’s January 15, 2019 Memorandum, non-party Benjamin Rhodes (“Respondent”) by and through his undersigned attorney, hereby objects and responds as follows to Plaintiff’s Interrogatories.

GENERAL OBJECTIONS

These General Objections shall be, and hereby are, incorporated by reference into each Specific Objection below as though set forth fully therein.

1. Respondent objects to Plaintiff’s Interrogatories to the extent they seek information beyond the scope of the topics Judge Lamberth authorized for discovery in his January 15, 2019 Order.

2. Respondent objects to the Plaintiff’s Interrogatories, including the Definitions and Instructions and each specific Request therein, to the extent that it purports to impose obligations inconsistent with or outside the scope of the Rules, the Local Rules of the United States District Court for the District of Columbia (the “Local Rules”), or any other applicable rule or law.

Respondent will construe and respond to the Interrogatories in accordance with the requirements of the Federal and Local Rules and any other applicable rule or law.

3. Respondent objects to the Interrogatories to the extent that they seek information that is protected from disclosure by executive privilege, the attorney-client privilege, the attorney work product doctrine, and any other applicable privilege or immunity. Respondent does not intend to produce any information that is privileged or otherwise protected from disclosure. Inadvertent disclosure of any privileged information by Respondent shall not constitute a waiver of any applicable privilege.

4. Respondent objects to the Interrogatories to the extent that they request information from the National Security Council, the Executive Office of the President, or other White House offices, all of which are exempt from disclosure under the Freedom of Information Act (“FOIA”).

5. Respondent objects to the Interrogatories to the extent that they assume the existence of certain information or the occurrence of certain events. By objecting and responding to the Interrogatories, Defendant does not concede that any such information exists or that any such alleged events occurred.

6. Respondent objects to the Interrogatories to the extent that they seek information available to Plaintiff from other sources more closely related to the litigation.

7. Respondent objects to the Interrogatories to the extent that they are vague, ambiguous, or do not identify with sufficient particularity the information sought. Respondent will provide only that information that can be reasonably identified in response to each individual Interrogatory.

8. Respondent objects to the Interrogatories to the extent that they are overbroad, unduly burdensome, and seek information that is neither relevant to the issues in this action nor reasonably calculated to lead to the discovery of admissible evidence.

9. Respondent objects to the Interrogatories to the extent that they call for information that is not reasonably ascertainable by Respondent.

10. Respondent objects to the Interrogatories to the extent they are interposed for the purpose of annoyance, embarrassment, or harassment.

11. Respondent's responses and objections are based on his current knowledge. Further investigation may reveal additional facts or information that could lead to additions to, changes in, and/or variations from the responses herein. Without in any way obligating himself to do so, Respondent expressly reserves the right to supplement, amend, correct, clarify or modify the responses and objections as further information becomes available. Respondent also reserves the right to use or rely on, at any time, subsequently discovered information or information omitted from these responses and objections as a result of mistake, error, oversight, or inadvertence.

12. Respondent incorporates these general objections by reference into each response below as if set forth in full. Repeating certain general objections in response to a given Request does not waive them as to others, nor does it waive general objections not repeated.

13. Subject to and without waiving their general objections, Respondent further respond as follows:

SPECIFIC OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS

14. Respondent objects to Plaintiff's Instruction No. 1 to the extent it seeks to impose upon him a burden to seek information which is outside his personal knowledge, or his individual possession, control, or supervision, including but not limited to information from his government

email account or files during his service at the White House, which are no longer within his possession, control, or supervision.

15. Respondent objects to Plaintiff's Instruction No. 2. This instruction is ambiguous, overly broad, unduly burdensome, and seeks to impose an obligation on Respondent beyond those imposed by the Federal Rules of Civil Procedure and Judge Lamberth's January 15, 2019 Order. Respondent objects to Plaintiff's assertion inherent within its instructions that where Respondent does not recall information, or where the information requested is outside of his personal knowledge, possession, control, or supervision he has failed to answer an interrogatory fully and completely. Respondent also objects to Plaintiff's instruction to describe all efforts he made to identify information needed to answer the interrogatory and to "identify each person, if any, who is known by you to have such information."

16. Respondent objects to the definitions of "and" and "or" as being vague, ambiguous, and introducing confusion as to the interpretation of particular requests. It is the responsibility of the Party drafting third-party discovery requests to state each request with sufficient specificity and clarity to allow for a coherent response. Respondent will interpret "and" and "or" according to their ordinary and common usage in the context of each request in the absence of an understandable and specific instruction to the contrary.

17. Respondent objects to the definition of "Identify" to the extent that it purports to impose obligations beyond those imposed by the Federal Rules or the Local Rules.

18. Respondent objects to Instruction Nos. 1-6 to the extent purport to impose obligations and conditions on Respondent beyond those contemplated by the Federal Rules of Civil Procedure and Local Rules. Respondent reserves the right to object fully or partially to any Interrogatory, irrespective of whether it answers or responds fully or partially to any such

Interrogatory. Any answer or response by Respondent, whether partial or full, shall not waive any objection by Respondent, nor shall it waive Respondent's rights to withhold information on the basis of its objections, or any portions thereof.

SPECIFIC OBJECTIONS AND RESPONSES

Interrogatory No. 1. Identify when and from whom you received the Talking Points, including any and all drafts of the Talking Points.

Response No. 1. Respondent hereby incorporates all of the foregoing general objections. In addition, Respondent also objects to this Interrogatory to the extent it seeks information beyond the topics authorized in Judge Lamberth's January 15, 2019 Order or that is neither relevant to the subject matter of the action nor reasonably calculated to lead to the discovery of admissible evidence. Respondent also objects to this Interrogatory to the extent seeks communications that are outside the scope of the authorities provided by FOIA, or otherwise subject to certain Executive Branch privileges. Subject to, and without waiving any of the foregoing objections, Respondent responds as follows. Over the course of September 11-16, Respondent recalls there were many different drafts of talking points related to Benghazi and The Innocence of Muslims video. As was common practice for any national security event, talking points had to be developed and shared with U.S. government communicators for use in daily press briefings and in response to press inquiries. Respondent does not recall who in the Executive Branch may have drafted different versions of the documents being exchanged in this period. Respondent does recall, however, that at a Deputies Committee meeting on the morning of Saturday, September 15, Michael Morrell – the Deputy Director of the CIA – indicated that he would draft a set of talking points that could be used on the Sunday shows to be responsive to congressional interest in Benghazi. Respondent recalls receiving those talking points that same day.

Interrogatory No. 2. Identify everyone you communicated with regarding the Talking Points during the September 11-16, 2012 time period.

Response No. 2. Respondent hereby incorporates all of the foregoing general objections. In addition, Respondent also objects to this Interrogatory to the extent it seeks information beyond the topics authorized in Judge Lamberth's January 15, 2019 Order or that is neither relevant to the subject matter of the action nor reasonably calculated to lead to the discovery of admissible evidence. Respondent also objects to this Interrogatory as overly broad and burdensome to the extent it requests that he identify *all people* with whom he communicated regarding *all topics* generally referred to in the Talking Points. Such an instruction plainly asks for information beyond the scope of Judge Lamberth's January 15 Order, seeks communications that are beyond the scope of documents discoverable under FOIA, and seeks internal White House and National Security Council deliberations which may be subject to applicable privileges. Subject to, and without waiving any of the foregoing objections, Respondent responds as follows. Over the course of September 11-16, Respondent recalls there were many different drafts of talking points related to Benghazi and The Innocence of Muslims video. As was common practice for any national security event, talking points had to be developed and shared with U.S. government communicators for use in daily press briefings and in response to press inquiries. While Respondent cannot recall every single person who was included in a communication related to talking points and press guidance related to Benghazi and The Innocence of Muslims, this process would have included senior White House communications officials; the State Department spokeswoman, Toria Nuland; and spokespeople for the intelligence community, including the DNI and FBI.

Interrogatory No. 3. Describe in detail all changes or edits you or your staff made to the Talking Points. Please identify in your answer the individual who made the change or edit.

Response No. 3. Respondent hereby incorporates all of the foregoing general objections. Respondent also objects to this Interrogatory to the extent it seeks information beyond the topics authorized in Judge Lamberth's January 15, 2019 Order or that is neither relevant to the subject matter of the action nor reasonably calculated to lead to the discovery of admissible evidence. Respondent also objects to the extent this Interrogatory seeks information that is exempt from production under FOIA, and to the extent it seeks internal White House and National Security Council deliberations which may be subject to applicable privileges. Respondent further objects to the extent that this Interrogatory calls for information that would require Respondent to review his White House records, to which he lacks access and legal control. As such, Respondent is unable to answer this Interrogatory fully. Subject to, and without waiving any of the foregoing objections, Respondent responds as follows. With respect to the talking points that were used on the Sunday shows by Ambassador Rice, Respondent remembers receiving a draft of those points from Michael Morrell on Saturday, September 15th. Respondent recalls making only one edit to those talking points – changing an inaccurate reference to a “consulate” in Benghazi to reflect the fact that it was not a formal consulate. Respondent recollection is that he then forwarded the final draft of those talking points to Ambassador Rice's spokeswoman. Insofar as there were edits to any talking points related to Benghazi that predated the talking points that Ambassador Rice used on the Sunday shows, there were many drafts of press guidance and talking points that were being circulated in the days following September 11th. Respondent has no specific recollection of edits he may have made to the many different press guidance packages that were prepared by his staff and other U.S. government communicators over the course of that week.

Interrogatory No. 4. Other than daily intelligence briefings, describe all meetings or discussions you had with anyone about the events in Benghazi during the September 11-16, 2012 time period.

Response No. 4. Respondent hereby incorporates all of the foregoing general objections. Respondent also objects to this Interrogatory to the extent it seeks information beyond the topics authorized in Judge Lamberth's January 15, 2019 Order or that is neither relevant to the subject matter of the action nor reasonably calculated to lead to the discovery of admissible evidence. Respondent also objects to the extent this Interrogatory seeks information that is exempt from production under FOIA, and to the extent it seeks internal White House and National Security Council deliberations which may be subject to applicable privileges. Respondent further objects to the extent that this Interrogatory calls for information that would require Respondent to review his White House records, to which he lacks access and legal control. As such, Respondent is unable to answer this Interrogatory fully. Subject to, and without waiving any of the foregoing objections, Respondent responds as follows. Following the attacks on the U.S. Embassy in Cairo and its facility in Benghazi on September 11, there were near constant discussions and meetings in the Executive Branch, including the White House, relating to the attacks, The Innocence of Muslims video that was causing unrest across the Muslim World, and the U.S. response to those events. With respect to meetings or discussion that involved representatives of the State Department, throughout the 11th, Respondent recalls that there were many impromptu meetings on developments in both Cairo and Benghazi, as well as phone conversations with State Department officials like Cheryl Mills and Jake Sullivan who were monitoring the situation for Secretary Clinton. Respondent recalls several Deputies Committee meetings over the course of that week to review the Embassy security posture around the world, to review the events of September 11th, to review the fallout from The Innocence of Muslims, and to consider what precautions or actions we

had to take in response. Respondent recalls at least one meeting on those topics where principals were present. Respondent recalls having a meeting focused on how we could enlist alumni of U.S. government exchange programs and other public diplomacy initiatives to calm the furor in the Muslim world – and the Middle East, in particular – over The Innocence of Muslims. Respondent recalls having multiple conference calls with U.S. government communicators about how to respond to the unrest across the Muslim world, particularly in the run-up to Friday prayers in the Muslim world. Respondent recalls having meetings about the ceremony that would take place to welcome back the return of the remains of those who we tragically lost in Benghazi. Respondent recalls having several conversations with individuals who were upset because they knew Chris Stevens personally.

Interrogatory No. 5. Describe in detail all conversations you had with Jacob Sullivan or anyone else in the Office of Secretary Clinton during the September 11-16, 2012 time period as they related to Benghazi. For each conversation, please identify all persons who participated in the conversation.

Response No. 5. Respondent hereby incorporates all of the foregoing general objections. Respondent objects to the extent that this Interrogatory imposes an undue burden on a third-party with respect to information that could readily be obtained by requests to a Party. Respondent also objects to this Interrogatory to the extent seeks communications that are outside the scope of the authorities provided by FOIA. Respondent further objects to the extent that this Interrogatory calls for information that would require Respondent to review his White House records, to which he lacks access and legal control. As such, Respondent is unable to answer this Interrogatory fully. Subject to, and without waiving any of the foregoing objections, Respondent responds as follows. On the night of September 11th, Respondent recalls talking to Jake Sullivan on the phone about the statement that would be released from Secretary Clinton, which was going to be the first U.S. government statement formally confirming the death of U.S. Ambassador Chris

Stevens; Respondent does not recall who else participated on that call. For the rest of the week, State Department officials would have been present in the various meetings where Benghazi was discussed. While Respondent does not recall every official who attended those meetings, Respondent recalls that they included Secretary Clinton for at least one meeting, as well as Cheryl Mills, Pat Kennedy, and Jake Sullivan; Respondent does recall that for some of the Deputies Committee meetings, the State Department participants participated by Videoconference, and there were several more officials participating on behalf of the State Department that Respondent does not recall. Respondent recalls asking Philippe Reines – via email – if Secretary Clinton would participate on the Sunday shows (she did not).

Interrogatory No. 6. On Sunday morning, September 16, 2012, Ambassador Susan Rice appeared on five morning talk shows: ABC's "This Week," CBS' "Face the Nation," NBC's "Meet the Press," FOX News' "Sunday," and "CNN's "State of the Union," to discuss the attacks that occurred on September 11, 2012 in Benghazi. In response to Jake Tapper's question for the latest information on the attacks, Ambassador Rice responded:

...based on the information that we have at present, is that, in fact, what this began as a spontaneous -- not a premediated -- response to what had transpired in Cairo. In Cairo, as you know, a few hours earlier, there was a violent protest that was undertaken in reaction to this very offensive video that was disseminated.

Later in the interview, she again stated:

What happened this week in Cairo, in Benghazi, in many other parts of the region...was a result -- a direct result of a heinous and offensive video that was widely disseminated, that the U.S. government had nothing to do with, which we have made clear is reprehensible and disgusting.

A copy of the interview transcript is available online at <https://abcnews.go.com/Politics/week-transcript-us-ambassador-united-nations-susan-rice/story?id=17240933>, last accessed May 7, 2019. Please provide in detail all the facts that were provided to you during the September 11- 16, 2012 time period to support Ambassador Rice's part of the statement that what happened in Benghazi "was a result -- a direct result of the heinous and offensive video." In your answer, please identify all individuals who provided the facts you rely on to answer the interrogatory.

Response No. 6. Respondent hereby incorporates all of the foregoing general objections. Respondent objects to this Interrogatory to the extent it seeks information beyond the

topics authorized in Judge Lamberth's January 15, 2019 Order or that is neither relevant to the subject matter of the action nor reasonably calculated to lead to the discovery of admissible evidence. Respondent also objects to the extent this Interrogatory seeks information that is exempt from production under FOIA, and to the extent it seeks internal White House and National Security Council deliberations which may be subject to applicable privileges. Respondent further objects to the extent that this Interrogatory calls for information that would require Respondent to review his White House records, to which he lacks access and legal control. As such, Respondent is unable to answer this Interrogatory fully. Subject to, and without waiving any of the foregoing objections, Respondent responds as follows. As has been investigated and documented over the last six and a half years, the U.S. government's initial understanding of the events in Benghazi was related to its understanding of the events in Cairo. On September 11, there were protests in Cairo that were in response to The Innocence of Muslims video which had aired on Egyptian television. The protests in Cairo became violent, and the U.S. Embassy was threatened and some of its security barriers were breached. Later that day, the attacks in Benghazi began to unfold. Respondent recalls that the intelligence community initially assessed that the attackers in Benghazi were motivated by what they saw taking place in Cairo; in other words, the assessment was that The Innocence of Muslims video triggered the protests in Cairo, which in turn had motivated the people in Benghazi. Moreover, Respondent recalls that there were open source, press reports that indicated that there were protests in Benghazi related to The Innocence of Muslims. Finally, over the course of that week, Respondent recalls learning that there were violent protests in many parts of the Muslim world motivated by The Innocence of Muslims, including at U.S. diplomatic facilities in Khartoum, Sudan; Tunis, Tunisia; Cairo, Egypt; Islamabad, Pakistan; Sanaa, Yemen; among other

places. In short, the entire week was filled with acts of protest and violence across the Middle East and North Africa that appeared to be related to The Innocence of Muslims video.

Interrogatory No. 7. Identify all persons in the Office of Secretary Clinton with whom you communicated concerning the Talking Points after Ambassador Rice's September 16, 2012 interview.

Response No. 7. Respondent hereby incorporates all of the foregoing general objections. Respondent objects because this Interrogatory fails to include any time limitation and is overly broad. Respondent further objects to this Interrogatory to the extent it seeks information beyond the topics authorized in Judge Lamberth's January 15, 2019 Order or that is neither relevant to the subject matter of the action nor reasonably calculated to lead to the discovery of admissible evidence. In addition, Respondent objects to the extent that this Interrogatory imposes an undue burden on a third-party with respect to information that could readily be obtained by requests to a Party. Respondent further objects to the extent that this Interrogatory calls for information that would require Respondent to review his White House records, to which he lacks access and legal control. As such, Respondent is unable to answer this Interrogatory fully. Subject to, and without waiving any of the foregoing objections, Respondent responds as follows. Respondent does not recall specific conversations with people in the Office of Secretary Clinton concerning the Talking Points following Ambassador Rice's appearances. Respondent does recall that there were regular Deputies meetings in the following days about Embassy Security and the controversy over the public response to Benghazi, and that certain of those meetings included Cheryl Mills and Jake Sullivan.

Interrogatory No. 8. Identify each of your staff members who, based on their position and responsibilities, would have communicated with Jacob Sullivan or anyone else in the Office of Secretary Clinton about the Benghazi attacks during the September 11-16, 2012 time period.

Response No. 8. Respondent hereby incorporates all of the foregoing general objections. Respondent further objects to the extent that this Interrogatory calls for a speculative and hypothetical response. In addition, Respondent objects to the extent that this Interrogatory imposes an undue burden on a third-party with respect to information that could readily be obtained by requests to a Party. Subject to, and without waiving any of the foregoing objections, Respondent responds as follows. Respondent's recollection is that NSC spokespeople Tommy Vietor and Bernadette Meehan were in contact with the State Department about the public response to the Benghazi attacks during that time period given their responsibility to help coordinate press guidance for U.S. government communicators.

Interrogatory No. 9. Describe in detail the conversation you had with Ambassador Rice in the parking garage after her testimony before the U.S. House Select Committee on Benghazi and prior to your testimony before the same committee. For reference, the conversation you had is mentioned in your book, titled "The World as It is" on pages 360 and 361 (bottom paragraph of page 360 and continues into the top paragraph of page 361).

Response No. 9. Respondent recalls saying hello to Ambassador Rice in the parking garage as she was leaving and Respondent was entering the building. Respondent remembers exchanging nothing beyond pleasantries in that momentary encounter.

Interrogatory No. 10. State whether you ever emailed Jacob Sullivan for government business to his gmail account or any other non-state.gov email account during his tenure at the State Department. If your answer is in the affirmative, please state why you used Jacob Sullivan's non-state.gov email address for your electronic communication with him.

Response No. 10. Respondent hereby incorporates all of the foregoing general objections. In addition, Respondent objects to the extent that this Interrogatory imposes an undue burden on a third-party with respect to information that could readily be obtained by requests to a Party. Respondent also objects to this Interrogatory to the extent it seeks information beyond the topics authorized in Judge Lamberth's January 15, 2019 Order or that is neither relevant to the subject matter of the action nor reasonably calculated to lead to the discovery of admissible

evidence. Subject to, and without waiving any of the foregoing objections, Respondent responds as follows. Although Respondent regularly communicated with Mr. Sullivan during his tenure at the State Department, Respondent has no recollection of emailing Jake Sullivan for government business to any non-state.gov email.

Interrogatory No. 11. Identify all individuals in the Office of Secretary Clinton, other than Jacob Sullivan, with whom you communicated by email to their non-state.gov email account, including, but not limited to, Cheryl Mills and Huma Abedin. For each individual identified, please state why you communicated with the individual via their non-state.gov email account(s) as opposed to their government issued email account.

Response No. 11. Respondent hereby incorporates all of the foregoing general objections. Respondent further objects to this Interrogatory to the extent it seeks information beyond the topics authorized in Judge Lamberth's January 15, 2019 Order or that is neither relevant to the subject matter of the action nor reasonably calculated to lead to the discovery of admissible evidence. In addition, Respondent objects to the extent that this Interrogatory imposes an undue burden on a third-party with respect to information that could readily be obtained by requests to a Party. Subject to, and without waiving any of the foregoing objections, Respondent responds as follows. Respondent has no recollection of emailing individuals in the Office of Secretary Clinton for government business on their personal email accounts. Respondent has personal relationships with some individuals who worked in the Office of Secretary Clinton, and accordingly would have emailed them for personal (non-government) issues on their personal email accounts.

Interrogatory No. 12. State whether you ever emailed anyone in the Office of Secretary Clinton for government business from your non-government issued email account. If your answer is in the affirmative, please state why you emailed from your non-government issued email account.

Response No. 12. Respondent hereby incorporates all of the foregoing general objections. Respondent further objects to this Interrogatory in its entirety as it is beyond the topics authorized in Judge Lamberth's January 15, 2019 Order and is neither relevant to the subject matter

of the action nor reasonably calculated to lead to the discovery of admissible evidence. In addition, Respondent objects to the extent that this Interrogatory imposes an undue burden on a third-party with respect to information that could readily be obtained by requests to a Party. Subject to, and without waiving any of the foregoing objections, Respondent responds as follows. Respondent does not recall emailing individuals in the Office of Secretary Clinton for government business from any non-government issued email account.

Interrogatory No. 13. Describe in detail your understanding, prior to the March 2, 2015 New York Times' article about Secretary Clinton's emails, of Secretary Clinton's use of a non- governmental email account as Secretary of State.

Response No. 13. Respondent hereby incorporates all of the foregoing general objections. Respondent further objects to this Interrogatory in its entirety as it is beyond the topics authorized in Judge Lamberth's January 15, 2019 Order and is neither relevant to the subject matter of the action nor reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without waiving any of the foregoing objections, Respondent responds as follows. Respondent recalls learning about Secretary Clinton's use of a non-governmental email account when it was reported in the press.

Interrogatory No. 14. State whether you had any knowledge, prior to the March 2, 2015 New York Times' article about Secretary Clinton's emails, about the Freedom of Information Act ("FOIA") request submitted by Citizens for Responsibility and Ethics in Washington ("CREW") to the State Department on or about December 6, 2012 concerning Secretary Clinton's email use as Secretary of State. For reference, a copy of the FOIA request is attached hereto as Exhibit 1.

Response No. 14. Respondent hereby incorporates all of the foregoing general objections. Respondent further objects to this Interrogatory to the extent it seeks information beyond the topics authorized in Judge Lamberth's January 15, 2019 Order or that is neither relevant to the subject matter of the action nor reasonably calculated to lead to the discovery of admissible

evidence. Subject to, and without waiving any of the foregoing objections, Respondent responds as follows. Respondent does not recall having any such knowledge.

Interrogatory No. 15. Identify all individuals in the White House, including, but not limited to, the Office of White House Counsel, with knowledge about the CREW FOIA request referenced in Interrogatory No. 14 prior to the March 2, 2015 New York Times' article about Secretary Clinton's emails.

Response No. 15. Respondent hereby incorporates all of the foregoing general objections. Respondent further objects to this Interrogatory in its entirety as it is beyond the topics authorized in Judge Lamberth's January 15, 2019 Order and is neither relevant to the subject matter of the action nor reasonably calculated to lead to the discovery of admissible evidence. Subject to, and without waiving any of the foregoing objections, Respondent responds as follows. Respondent has no idea who in the White House was aware of the Citizens for Responsibility and Ethics in Washington FOIA request.

Respectfully submitted,

/s/ Michael J. Gottlieb
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Dated: June 7, 2019

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Objections and Responses of Non-Party Benjamin Rhodes to Plaintiff's Interrogatories was served via electronic mail on this 7th day of June, 2019.

/s/ Michael J. Gottlieb
Michael J. Gottlieb