

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

JUDICIAL WATCH, INC.,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Civil Action No. 14-cv-1242 (RCL)
)	
U.S. DEPARTMENT OF STATE,)	
)	
<i>Defendant.</i>)	
)	

**PLAINTIFF JUDICIAL WATCH, INC.’S SUPPLEMENTAL
INTERROGATORIES TO DEFENDANT U.S. DEPARTMENT OF STATE**

Plaintiff Judicial Watch, Inc., pursuant to the Court’s August 22, 2019 Order (ECF No. 135) and Rule 33 of the Federal Rules of Civil Procedure, submits the following supplemental interrogatories to be answered under oath by Defendant U.S. Department of State.

INSTRUCTIONS AND DEFINITIONS

1. Your answers to these interrogatories should include information within your actual or constructive possession, custody, or control, including information which may be held by your attorneys, representatives, all persons acting under, by, or through you, or subject to your control or supervision, and all persons acting on your behalf.

2. If you cannot answer an interrogatory fully and completely, answer as much as you can and provide all facts upon which you rely in support of your contention that you cannot answer fully and completely. In each instance in which you claim insufficient knowledge or information to answer an interrogatory fully and completely, describe all of the efforts you made to locate the information needed to answer the interrogatory and identify each person, if any, who is known by you to have such information.

3. In answering an interrogatory, state whether the information furnished in the answer is within the personal knowledge of the person answering and, if not, identify each person who has personal knowledge of the information furnished in the answer.

4. If you object to any portion of an interrogatory, but not the entire interrogatory, identify the specific portion of the interrogatory to which objection is made and answer the portion of the interrogatory to which no objection is made.

5. If you object to any interrogatory on the grounds that the interrogatory is overly broad or unduly burdensome, answer the interrogatory by providing all information that is not alleged to be overly broad or unduly burdensome and identify the nature, quality, quantity, or volume of the withheld information and the effort that would be required to provide the withheld information.

6. If you object to any interrogatory on the grounds that the interrogatory calls for information that is subject to a claim of privilege, state the privilege that is claimed 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.

7. “And” and “or” are to be construed both conjunctively and disjunctively, as necessary, to make the interrogatory inclusive rather than exclusive. Similarly, any use of the singular shall also mean the plural and vice versa, to give the interrogatory its broadest possible meaning.

8. The definitions provided below are hereby incorporated into each interrogatory in which the term appears:

a. “Identify” when used with respect to a natural person means state the person’s full name, present or last known business address (or, if no business address, home address), and the person’s employer and position at the time in question with respect to the particular interrogatory involved.

b. ”FOIA” refers to Freedom of Information Act.

c. “State Department” refers to the U.S. Department of State.

d. “FBI” refers to the Federal Bureau of Investigation.

e. “PST” refers to a personal folder file.

f. “S/ES” refers to Executive Secretariat within the U.S. Department of State.

g. “OIG” refers to Office of Inspector General within the U.S. Department of State.

INTERROGATORIES

1. Identify the State Department official whose FBI interview was marked as Hackett Deposition Exhibit 21, as well as the names of the attorney, PST file, and FOIA request referenced in the third full paragraph on the first page therein. The information currently is redacted in the public version of the FBI’s notes. *See* Ex. 4 (Hackett Ex. 21) attached to Plaintiff’s Status Report filed August 21, 2019 (ECF No. 131-4).

2. Identify the “fifth document” identified by S/ES in the fall of 2014 but deemed unresponsive and, for each email recipient or sender, specify whether the email address belonged to a state.gov email account or a non-state.gov email account. *See* Ex. 3 (Hackett Ex. 17) attached to Plaintiff’s Status Report filed August 21, 2019 (ECF No. 131-3); *see also* Jan. 2016

OIG Report, *Evaluation of the Department of State's FOIA Processes for Requests Involving the Office of the Secretary*, at p. 15 (Jan. 2016), available at <https://www.stateoig.gov/system/files/esp-16-01.pdf> (last accessed August 18, 2019).

Dated: August 23, 2019

Respectfully submitted,

JUDICIAL WATCH, INC.

/s/ Ramona R. Cotca
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