

**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  
INTERROGATORIES TO ROBERT J. PRINCE**

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 interrogatories to be answered under oath by Department of Justice Attorney Robert J. Prince.

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

c. “Clinton” refers to former Secretary of State Hillary Rodham Clinton.

### **INTERROGATORIES**

1. State when you first learned that (i) the State Department was going to request Clinton’s emails and/or federal records in her possession; (ii) the State Department had requested Clinton’s emails and/or federal records in her possession; and (iii) Clinton had provided copies of her emails to the State Department on December 5, 2014. Plaintiff does not seek attorney-client information but rather only the dates you learned of these facts.

Dated: August 23, 2019

Respectfully submitted,

**JUDICIAL WATCH, INC.**

/s/ Ramona R. Cotca  
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