

FOIA MARKER

**This is not a textual record. This is used as an
administrative marker by the William J. Clinton
Presidential Library Staff.**

Collection/Record Group: Clinton Presidential Records

Subgroup/Office of Origin: Counsel Office

Series/Staff Member: Dimitri Nionakis

Subseries:

OA/ID Number: 23832

FolderID:

Folder Title:

Sculimbrene Pleadings

Stack:

S

Row:

109

Section:

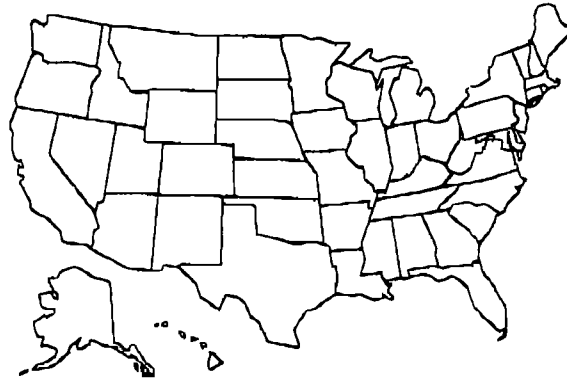
2

Shelf:

2

Position:

1



CIVIL DIVISION
FEDERAL PROGRAMS BRANCH
FAX TRANSMITTAL COVER SHEET

DATE: March 14, 2000

TO: DIMITRI NIONAKIS

FAX NUMBER: (202) 456-7024

FROM: John R. Tyler
OFFICE NUMBER: (202) 514-2356
FAX NUMBERS: (202) 616-8470, 8202 or 8460

THERE ARE A TOTAL OF 9 PAGES INCLUDING THIS COVER PAGE IN
THIS TRANSMITTAL

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

M. DENNIS SCULIMBRENE,

Plaintiff,

vs.

JANET RENO, THE EXECUTIVE
OFFICE OF THE PRESIDENT, JACK
QUINN, HOWARD SHAPIRO, LANNY
J. DAVIS and JOHN AND JANE DOES
NOS. 1-5,

Defendants.

Case No. 1:99-cv-2010 (RCL)

**PLAINTIFF'S SECOND SET OF INTERROGATORIES TO DEFENDANT
EXECUTIVE OFFICE OF THE PRESIDENT**

Plaintiff, M. Dennis Sculimbrene, by counsel and pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, hereby requests that Defendant Executive Office of the President answer the following interrogatories within 30 days of service hereof. Answers should be served upon Plaintiff's counsel, Judicial Watch, Inc., at 501 School Street, S.W., Suite 700, Washington, D.C. 20024.

INSTRUCTIONS

A. In each of your answers to these Interrogatories, you are requested to provide not only such information as is in your possession, but also all information as is reasonably available, whether or not it is in your possession. In the event you are able to provide only part of the information called for by any particular interrogatory, provide all of the information you are able to provide and state the reason for your inability to state the remainder.

B. If you object to, or otherwise decline to answer, any portion of an interrogatory, please provide all information called for in that portion of the interrogatory to which you do not object, or to which you do not decline to answer. If you object to an interrogatory on the ground that it is too broad (i.e., that it calls both for information which is relevant to the subject matter of the action and for information which is not relevant), please provide such information as you concede to be relevant. If you object to an interrogatory on the ground that it would constitute an undue burden to provide an answer, please provide such requested information as can be supplied without undertaking such undue burden. For those portions of an Interrogatory to which you object or otherwise decline to answer, state the reason for such objection or declination.

C. For purposes of these interrogatories, the relevant time period, unless otherwise stated, shall be from December 1985 through the present.

D. These interrogatories are continuing in nature and require you to file timely supplementation of responses in accordance with Fed. R. Civ. P. 26(e).

DEFINITIONS

The following words or terms shall be deemed to mean the following:

1. The terms "document" or "documents" means the original (or, when the original is not in your possession, custody, or control, a duplicate copy of the original), and any non-identical copy (e.g., different from the original because of attachments, notes, changes, or markings) of all written, printed, typed, recorded, or visually or aurally reproduced material of any kind, all graphic materials and data compilations from which information can be obtained, all materials using other means of preserving thought or expression, and all tangible things from which information can be obtained, processed or transcribed, prepared by any person, whether or not privileged, including

without limitation all correspondence, memoranda, notes, messages, letters, cards, telegrams, teletypes, facsimiles, papers, drawings, sketches, forms, records, communications, telephone messages, diaries, schedules, calendars, chronological data, minutes, books, reports, charts, lists, ledgers, invoices, worksheets, receipts, returns, computer printouts, prospectuses, statements, checks, statistics, surveys, affidavits, contracts, agreements, transcripts, magazine or newspaper articles, press releases, and any and all drafts, alterations, modifications, changes and amendments of any of the foregoing, and any and all devices used for holding documents, including without limitation all file folders, file binders, file wrappers, file labels, file sleeves, file jackets, envelopes, and portfolios, and any and all aural and video records, recordings, and representations of any kind, including without limitation all photographs, microfiche, microfilm, videotapes, motion pictures, and electronic, magnetic, mechanical and electric records or representations of any kind, electronic mail ("e-mail"), meaning any electronically transmitted graphic or text communication created upon and transmitted or received by computer or other electronic device, including both records managed e-mail and e-mail non-records managed e-mail, which said non-records managed e-mail is sometimes known or referred to as "mail 2."

2. "EOP" means all offices, agencies, divisions, branches or organizational units of the Executive Office of the President.

3. "The White House" means the residence and business offices of the President of the United States and his spouse, the First Lady, including but not limited to all related offices, agencies, divisions, branches, bureaus, commissions and organizational units, however denominated.

4. The terms "concerning" and/or "relating to" means affecting, bearing upon, comprising, concerning, constituting, containing, dealing with, embodying, embracing, encompassing,

entailing, evidencing, germane to, identifying, implicating, including, incorporating, involving, pertaining to, regarding, relating to, referring to, reflecting, in any manner.

5. The term "describe" means fully and completely state, explain, illustrate, characterize, define, delineate, recount, detail, designate, expound, elucidate or recapitulate.

6. The term "identify" means designate, specify, name, pinpoint, relate, or relate.

7. The terms "and" and "or" shall be construed conjunctively and disjunctively, as necessary, to make the document request inclusive rather than exclusive.

INTERROGATORIES

INTERROGATORY NO. 1:

Identify all persons who assisted with, or were otherwise involved in, the preparation or dissemination of the "press package" referred to in Answer No. 2 of Defendant Executive Office of the President's Response to Plaintiff's First Set of Interrogatories (Bates Stamp Nos. 439-482). With regard to each such person, describe the assistance that each person provided or the involvement of each person in the preparation or dissemination of the "press package."

ANSWER:

INTERROGATORY NO. 2:

State whether the "press package" referred to in Answer No. 2 of Defendant Executive Office of the President's Response to Plaintiff's First Set of Interrogatories (Bates Stamp Nos. 439-482) was provided to Defendant Lanny J. Davis. If the answer is "yes," identify the date, time, place and

circumstances under which the "press package" was provided to Defendant Lanny J. Davis, including the identity of the person(s) who provided the "press package" to Defendant Lanny J. Davis.

ANSWER

INTERROGATORY NO. 3:

Identify all communications between Defendant Lanny J. Davis and any EOP official(s) and/or employee(s), including but not limited to persons in the White House Counsel's Office, President William Jefferson Clinton and/or Hillary Rodham Clinton, concerning or relating to Plaintiff. For each such communication, identify: (a) the date of each communication; (b) whether the communication was oral, in writing, or by electronic means; (c) the identity of each person who participated in the communication; (d) what was stated by each individual; and (e) if a conversation, whether the conversation took place in person or by telephone.

ANSWER

INTERROGATORY NO. 4:

Identify all communications between Defendant Howard Shapiro and any EOP official(s) and/or employee(s), including but not limited to persons in the White House Counsel's Office, President William Jefferson Clinton and/or Hillary Rodham Clinton, concerning or relating to Plaintiff.

For each such communication, identify: (a) the date of each communication; (b) whether the communication was oral, in writing, or by electronic means; (c) the identity of each person who participated in the communication; (d) what was stated by each individual; and (e) if a conversation, whether the conversation took place in person or by telephone.

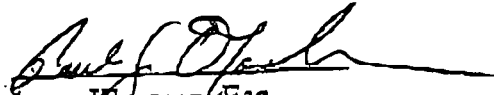
ANSWER

INTERROGATORY NO. 5:

Identify all meetings of EOP officials and/or staffers, including but not limited to persons in the White House Counsel's Office, President William Jefferson Clinton and/or Hillary Rodham Clinton, concerning or relating to Plaintiff and/or the "Insert" prepared by Plaintiff and attached hereto as Exhibit 1. For each such meeting, identify: (a) the date of the meeting; (b) the location of the meeting; (c) the identity of each person who participated in the meeting; and (d) what was stated by each individual.

ANSWER

JUDICIAL WATCH, INC.


Larry Klayman, Esq.

D.C. Bar No.

Paul J. Orfanedes, Esq.

D.C. Bar No. 429716

Suite 725

501 School Street, S.W.

Washington, D.C. 20024

(202) 646-5172

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

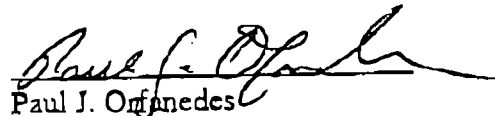
I hereby certify that on March 14, 2000 a true and correct copy of the foregoing PLAINTIFFS' SECOND SET OF INTERROGATORIES TO DEFENDANT EXECUTIVE OFFICE OF THE PRESIDENT was served via facsimile and first class, U.S. mail, postage prepaid, on the following:

Attorneys for Defendants Janet Reno, Jack Quinn, Howard Shapiro
and the Executive Office of the President:

Anne L. Weismann, Esq.
John R. Tyler, Esq.
U.S. DEPARTMENT OF JUSTICE
Room 1074
901 E Street, N.W.
Washington, DC 20004

Attorneys for Defendant Lanny J. Davis:

Timothy B. Mills, Esq.
T. Michael Guiffre, Esq.
PATTON BOGGS, L.L.P.
2550 M Street, N.W.
Washington, DC 20037-1350


Paul J. Orfanedes

MEMORANDUM

To: Karl Racine

From: Ali Wines *Ali Wines*

Date: 4/25/00

RE: Searched "Hits"

As you know, Tony Barry found 12 hits, in the following files, with the name Sculimbrene:

1996

F_05232141_OA.TXT;1
F_5U218IKW_OA.TXT;1
F_BJEGAHKW_OA.TXT;1
F_P5235495_OA.TXT;1
F_QAZ2EVKW_OA.TXT;1

1997

F_22176757_OA.TXT;1
F_26142746_OA.TXT;1
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F_ES94JXSW_OA.TXT;1
F_S2334896_OA.TXT;1
F_V2177187_OA.TXT;1

1998

F_L3160614_OA.TXT;1

I reviewed these files on 4/24/2000 and found them all to be non-responsive. Indeed the Sculimbrene references were all to Thomas Sculimbrene.

Please let me know if you have any further questions to this particular review.

Thanks.