

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

ACCURACY IN MEDIA, INC. et al.,)	
)	
Plaintiffs,)	
)	
v.)	
)	Civil Action No. 14-1589 (EGS)
DEPARTMENT OF DEFENSE, et al.,)	
)	
Defendants.)	
_____)	

**PLAINTIFFS' FIRST SET OF INTERROGATORIES
TO DEFENDANT DEPARTMENT OF DEFENSE**

Pursuant to Federal Rule of Civil Procedure 33, Plaintiffs hereby submit the following Interrogatory to Defendant identified above. Plaintiffs requests that Defendant serve its answers, in writing and under oath, to the undersigned counsel for Plaintiffs at 1629 K Street, NW, Suite 300, Washington, DC 20006, within thirty (30) days of service of these Interrogatories.

INSTRUCTIONS

1. Each interrogatory is to be answered separately, in writing, and as fully as possible.
2. If any interrogatory herein cannot be answered in full after exercising due diligence to secure the information to do so, it shall be answered to the extent possible with an explanation as to why a complete answer is not possible.
3. To the extent that you believe that an interrogatory is objectionable, answer so much of the interrogatory as, in your view, is not objectionable and separately state the portion of each interrogatory to which you object and the grounds for your objection.

4. To the extent that you believe that an interrogatory calls for information subject to a privilege, answer so much of each interrogatory that, in your view, is not privileged and set forth the grounds upon which you believe the document is privileged, with sufficient particularity to allow the court to adjudicate the claim of privilege

5. To the extent that you believe any interrogatory is ambiguous, your answer should set forth the matter deemed ambiguous and the construction used in responding.

6. These interrogatories are continuing in nature and must be supplemented promptly if the plaintiff obtains additional or different information related to any response at any time before the termination of this action.

7. When interpreting these interrogatories words in the singular also include their plural. Words used in the plural also include their singular.

DEFINITIONS

1. The term "complete action on the request" means produce all requested records, or demonstrate that such records are exempt from disclosure, as the term is used in 5 U.S.C. § 552 (a)(7)(B)(ii), which states that, upon request, each agency shall provide "an estimated date on which the agency will complete action on the request."

2. "The Agency" refers to the entity to whom these Interrogatories are directed.

3. The term "expedited processing" means handling the Request as soon as practicable, taking the Request out of order, processing it before other requests, as that term is used in 5 U.S.C. § 552(a)(4)(A)(ii)(II).

INTERROGATORIES

Interrogatory No. 1: Provide an estimated date on which the Agency will complete action on the Request, in the absence of expedited processing.

John H. Clarke
1629 K Street, NW
Suite 300
Washington, DC 20006
(202) 344-0776
johnhclarke@earthlink.net

CERTIFICATE OF SERVICE

I hereby certify that and affirm that on September 23, 2014, a copy of the foregoing was mailed, by certified mail, return receipt requested, to:

Office of the US Attorney for
the District of Columbia
Civil Process Clerk
501 3rd Street, NW
Washington, DC 20530

Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

DEPARTMENT OF JUSTICE AND ITS
COMPONENT FEDERAL BUREAU OF
INVESTIGATION

Room B-103
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

CENTRAL INTELLIGENCE AGENCY
Washington, DC 20505

DEPARTMENT OF STATE
2201 C Street, NW
Washington, DC 20520

DEPARTMENT OF DEFENSE
100 Defense Pentagon
Washington, DC 20301-1000

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TO DEFENDANT DEPARTMENT OF STATE**

Pursuant to Federal Rule of Civil Procedure 33, Plaintiffs hereby submit the following Interrogatory to Defendant identified above. Plaintiffs requests that Defendant serve its answer, in writing and under oath, to the undersigned counsel for Plaintiffs at 1629 K Street, NW, Suite 300, Washington, DC 20006, within thirty (30) days of service of these Interrogatories.

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