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18 UNITED STATES DISTRICT COURT  
19 FOR THE NORTHERN DISTRICT OF CALIFORNIA

20 CAROLYN JEWEL, TASH HEPTING, )  
21 YOUNG BOON HICKS, as executrix of the )  
estate of GREGORY HICKS, ERIK KNUTZEN )  
22 and JOICE WALTON, on behalf of themselves )  
and all others similarly situated, )

23 Plaintiffs, )

24 v. )

25 NATIONAL SECURITY AGENCY, *et al.*, )

26 Defendants. )  
27  
28

CASE NO. 08-CV-4373-JSW

**PLAINTIFF CAROLYN JEWEL'S FIRST  
SET OF INTERROGATORIES TO THE  
GOVERNMENT DEFENDANTS**

Served June 17, 2016

The Honorable Jeffrey S. White

1 **PLAINTIFF JEWEL’S FIRST SET OF INTERROGATORIES TO THE GOVERNMENT**  
2 **DEFENDANTS**

3 Pursuant to Federal Rule of Civil Procedure 33, plaintiff Carolyn Jewel request that  
4 defendants National Security Agency, Department of Justice, and the United States (collectively,  
5 “the Government Defendants”) respond to the following interrogatories separately and fully, in  
6 writing, within thirty (30) days from the date of service.

7 **DEFINITIONS**

8 1. “You” and “Your” includes the United States; any agency, department, office,  
9 entity, officer, employee, or agent of the United States; any entity owned or controlled by the  
10 United States; the Department of Justice; and the National Security Agency.  
11

12 **INTERROGATORIES**

13 **I. Interrogatories Addressing Acquisition Of Plaintiffs’ Communications Records**  
14

15 **INTERROGATORY NO. 1:** Describe each disclosure to You, pursuant to a process of bulk  
16 collection, of any records or other information pertaining to plaintiffs’ use of AT&T’s electronic  
17 communications services or remote computing services, including telephone call records, other  
18 telephone call information, Internet records, Internet metadata, or other Internet information  
19 pertaining to each plaintiff.  
20

21 **INTERROGATORY NO. 2:** Identify each record or other information pertaining to each  
22 plaintiff’s use of electronic communications services or remote computing services that has been  
23 disclosed to You without any warrant or court order or subpoena authorizing the disclosure.  
24

25 **II. Interrogatories Addressing RFA Responses**  
26

27 **INTERROGATORY NO. 3:** If Your response to Request for Admission No. 1 of Plaintiffs’ First  
28 Set of Requests for Admission is anything other than an unqualified admission, describe all facts

1 and documents upon which You base Your response. If Your response instead is an unqualified  
2 admission, do not respond to this interrogatory.

3  
4 **INTERROGATORY NO. 4:** If Your response to Request for Admission No. 2 of Plaintiffs' First  
5 Set of Requests for Admission is anything other than an unqualified admission, describe all facts  
6 and documents upon which You base Your response. If Your response instead is an unqualified  
7 admission, do not respond to this interrogatory.

8  
9 **INTERROGATORY NO. 5:** If Your response to Request for Admission No. 3 of Plaintiffs' First  
10 Set of Requests for Admission is anything other than an unqualified admission, describe all facts  
11 and documents upon which You base Your response. If Your response instead is an unqualified  
12 admission, do not respond to this interrogatory.

13  
14 **INTERROGATORY NO. 6:** If Your response to Request for Admission No. 4 of Plaintiffs' First  
15 Set of Requests for Admission is anything other than an unqualified admission, describe all facts  
16 and documents upon which You base Your response. If Your response instead is an unqualified  
17 admission, do not respond to this interrogatory.

18  
19 **INTERROGATORY NO. 7:** If Your response to Request for Admission No. 16 of Plaintiffs'  
20 First Set of Requests for Admission is anything other than an unqualified admission, describe all  
21 facts and documents upon which You base Your response. If Your response instead is an  
22 unqualified admission, do not respond to this interrogatory.

23  
24 **INTERROGATORY NO. 8:** If Your response to Request for Admission No. 17 of Plaintiffs'  
25 First Set of Requests for Admission is anything other than an unqualified admission, describe all  
26 facts and documents upon which You base Your response. If Your response instead is an  
27 unqualified admission, do not respond to this interrogatory.

1 **INTERROGATORY NO. 9:** If Your response to Request for Admission No. 18 of Plaintiffs'  
2 First Set of Requests for Admission is anything other than an unqualified admission, describe all  
3 facts and documents upon which You base Your response. If Your response instead is an  
4 unqualified admission, do not respond to this interrogatory.

5  
6 **INTERROGATORY NO. 10:** If Your response to Request for Admission No. 19 of Plaintiffs'  
7 First Set of Requests for Admission is anything other than an unqualified admission, describe all  
8 facts and documents upon which You base Your response. If Your response instead is an  
9 unqualified admission, do not respond to this interrogatory.

10  
11 **INTERROGATORY NO. 11:** If Your response to Request for Admission No. 26 of Plaintiffs'  
12 First Set of Requests for Admission is anything other than an unqualified admission, describe all  
13 facts and documents upon which You base Your response. If Your response instead is an  
14 unqualified admission, do not respond to this interrogatory.

15  
16 **INTERROGATORY NO. 12:** If Your response to Request for Admission No. 27 of Plaintiffs'  
17 First Set of Requests for Admission is anything other than an unqualified admission, describe all  
18 facts and documents upon which You base Your response. If Your response instead is an  
19 unqualified admission, do not respond to this interrogatory.

20  
21 **INTERROGATORY NO. 13:** If Your response to Request for Admission No. 30 of Plaintiffs'  
22 First Set of Requests for Admission is anything other than an unqualified admission, describe all  
23 facts and documents upon which You base Your response. If Your response instead is an  
24 unqualified admission, do not respond to this interrogatory.

25  
26 **INTERROGATORY NO. 14:** If Your response to Request for Admission No. 31 of Plaintiffs'  
27 First Set of Requests for Admission is anything other than an unqualified admission, describe all  
28

1 facts and documents upon which You base Your response. If Your response instead is an  
2 unqualified admission, do not respond to this interrogatory.

3  
4 **INTERROGATORY NO. 15:** If Your response to Request for Admission No. 32 of Plaintiffs'  
5 First Set of Requests for Admission is anything other than an unqualified admission, describe all  
6 facts and documents upon which You base Your response. If Your response instead is an  
7 unqualified admission, do not respond to this interrogatory.

8  
9 **INTERROGATORY NO. 16:** If Your response to Request for Admission No. 38 of Plaintiffs'  
10 First Set of Requests for Admission is anything other than an unqualified admission, describe all  
11 facts and documents upon which You base Your response. If Your response instead is an  
12 unqualified admission, do not respond to this interrogatory.

13  
14 **INTERROGATORY NO. 17:** If Your response to Request for Admission No. 39 of Plaintiffs'  
15 First Set of Requests for Admission is anything other than an unqualified admission, describe all  
16 facts and documents upon which You base Your response. If Your response instead is an  
17 unqualified admission, do not respond to this interrogatory.

18  
19 **INTERROGATORY NO. 18:** If Your response to Request for Admission No. 40 of Plaintiffs'  
20 First Set of Requests for Admission is anything other than an unqualified admission, describe all  
21 facts and documents upon which You base Your response. If Your response instead is an  
22 unqualified admission, do not respond to this interrogatory.

23  
24 **INTERROGATORY NO. 19:** If Your response to Request for Admission No. 51 of Plaintiffs'  
25 First Set of Requests for Admission is anything other than an unqualified admission, describe all  
26 facts and documents upon which You base Your response. If Your response instead is an  
27 unqualified admission, do not respond to this interrogatory.

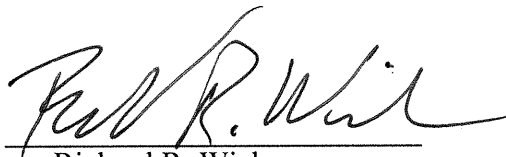
1 **INTERROGATORY NO. 20:** If Your response to Request for Admission No. 52 of Plaintiffs'  
2 First Set of Requests for Admission is anything other than an unqualified admission, describe all  
3 facts and documents upon which You base Your response. If Your response instead is an  
4 unqualified admission, do not respond to this interrogatory.

5  
6 **INTERROGATORY NO. 21:** If Your response to Request for Admission No. 53 of Plaintiffs'  
7 First Set of Requests for Admission is anything other than an unqualified admission, describe all  
8 facts and documents upon which You base Your response. If Your response instead is an  
9 unqualified admission, do not respond to this interrogatory.

10  
11 **INTERROGATORY NO. 22:** If Your response to Request for Admission No. 54 of Plaintiffs'  
12 First Set of Requests for Admission is anything other than an unqualified admission, describe all  
13 facts and documents upon which You base Your response. If Your response instead is an  
14 unqualified admission, do not respond to this interrogatory.

15  
16 **INTERROGATORY NO. 23:** If Your response to Request for Admission No. 55 of Plaintiffs'  
17 First Set of Requests for Admission is anything other than an unqualified admission, describe all  
18 facts and documents upon which You base Your response. If Your response instead is an  
19 unqualified admission, do not respond to this interrogatory.

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22 DATE: June 17, 2016

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26 DAVID GREENE  
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