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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 JOICE WALTON'S FIRST
SET OF INTERROGATORIES TO THE
GOVERNMENT DEFENDANTS**

Served June 17, 2016

The Honorable Jeffrey S. White

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

3 Pursuant to Federal Rule of Civil Procedure 33, plaintiff Joice Walton 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 **INTERROGATORIES**

12 **I. Interrogatories Addressing RFA Responses**

13 **INTERROGATORY NO. 1:** If Your response to Request for Admission No. 56 of Plaintiffs’
14 First Set of Requests for Admission is anything other than an unqualified admission, describe all
15 facts and documents upon which You base Your response. If Your response instead is an
16 unqualified admission, do not respond to this interrogatory.
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20 **INTERROGATORY NO. 2:** If Your response to Request for Admission No. 57 of Plaintiffs’
21 First Set of Requests for Admission is anything other than an unqualified admission, describe all
22 facts and documents upon which You base Your response. If Your response instead is an
23 unqualified admission, do not respond to this interrogatory.
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25 **INTERROGATORY NO. 3:** If Your response to Request for Admission No. 58 of Plaintiffs’
26 First Set of Requests for Admission is anything other than an unqualified admission, describe all
27 facts and documents upon which You base Your response. If Your response instead is an
28 unqualified admission, do not respond to this interrogatory.

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INTERROGATORY NO. 4: If Your response to Request for Admission No. 59 of Plaintiffs' First Set of Requests for Admission is anything other than an unqualified admission, describe all facts and documents upon which You base Your response. If Your response instead is an unqualified admission, do not respond to this interrogatory.

INTERROGATORY NO. 5: If Your response to Request for Admission No. 60 of Plaintiffs' First Set of Requests for Admission is anything other than an unqualified admission, describe all facts and documents upon which You base Your response. If Your response instead is an unqualified admission, do not respond to this interrogatory.

INTERROGATORY NO. 6: If Your response to Request for Admission No. 62 of Plaintiffs' First Set of Requests for Admission is anything other than an unqualified admission, describe all facts and documents upon which You base Your response. If Your response instead is an unqualified admission, do not respond to this interrogatory.

INTERROGATORY NO. 7: If Your response to Request for Admission No. 152 of Plaintiffs' First Set of Requests for Admission is anything other than an unqualified admission, describe all facts and documents upon which You base Your response. If Your response instead is an unqualified admission, do not respond to this interrogatory.

INTERROGATORY NO. 8: If Your response to Request for Admission No. 153 of Plaintiffs' First Set of Requests for Admission is anything other than an unqualified admission, describe all facts and documents upon which You base Your response. If Your response instead is an unqualified admission, do not respond to this interrogatory.

INTERROGATORY NO. 9: If Your response to Request for Admission No. 154 of Plaintiffs' First Set of Requests for Admission is anything other than an unqualified admission, describe all

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.

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4 **INTERROGATORY NO. 10:** If Your response to Request for Admission No. 163 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.

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9 **INTERROGATORY NO. 11:** If Your response to Request for Admission No. 164 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.

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14 **INTERROGATORY NO. 12:** If Your response to Request for Admission No. 165 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.

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19 **INTERROGATORY NO. 13:** If Your response to Request for Admission No. 167 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.

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24 **INTERROGATORY NO. 14:** If Your response to Request for Admission No. 168 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. 15:** If Your response to Request for Admission No. 170 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.

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6 **INTERROGATORY NO. 16:** If Your response to Request for Admission No. 171 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.

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11 **INTERROGATORY NO. 17:** If Your response to Request for Admission No. 172 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.

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16 **INTERROGATORY NO. 18:** If Your response to Request for Admission No. 174 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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21 **INTERROGATORY NO. 19:** If Your response to Request for Admission No. 175 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.

1 **II. Interrogatories Addressing Plaintiffs' Complaint**


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3 **INTERROGATORY NO. 20:** Describe the basis of any affirmative defense You contend relieves
4 You of liability under plaintiffs' complaint.

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6 **INTERROGATORY NO. 21:** If You deny any of the allegations of Count 9 (including
7 allegations incorporated by reference) of plaintiffs' complaint, describe the basis for Your denial.

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9 **INTERROGATORY NO. 22:** If You deny any of the allegations of Count 12 (including
10 allegations incorporated by reference) of plaintiffs' complaint, describe the basis for Your denial.

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12 **INTERROGATORY NO. 23:** If You deny any of the allegations of Count 15 (including
13 allegations incorporated by reference) of plaintiffs' complaint, describe the basis for Your denial.

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16 DATE: June 17, 2016

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