

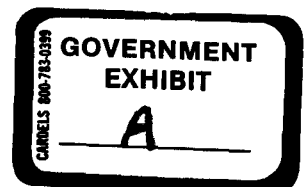
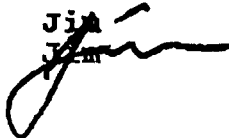
TO: AUSA Mercedeh Momeni
FAX NO. (202) 514-8780
PHONE NO. (202) 307-305-4851
RE: Civil Action No. 04-0814; Discovery
DATE: October 3, 2006
TIME; 2:25 AM
NO. OF PAGES: 8 + cover

FROM: James H. Lesar
ADDRESS: 1003 K Street, N.W.
Suite 640
Washington, D.C. 20001
PHONE: (202) 393-1921
FAX: (301) 657-3699

Dear Mercedeh:

Attached are a Notice of Deposition, request for production of documents, request for admissions, and interrogatories.

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

| | | |
|------------------------------|---|--------------------------------|
| ROGER HALL, <u>et al.</u> , | : | |
| | : | |
| Plaintiffs, | : | |
| | : | |
| v. | : | Civil Action No. 04-0814 (HHK) |
| | : | |
| CENTRAL INTELLIGENCE AGENCY, | : | |
| | : | |
| Defendant | : | |

NOTICE OF DEPOSITIONS TAKEN PURSUANT TO RULE
30(b)(6) OF THE FEDERAL RULES OF CIVIL PROCEDURE

To: Central Intelligence Agency
c/o Mercedeh Momeni
555 Fourth Street, N.W.
Washington, D.C. 20530

Please take notice that plaintiffs Roger Hall and Studies Solutions Results, Inc. (SSR) will take the depositions of all those CIA officers and/or employees who have any knowledge regarding the varying calculations of search fees incurred in response to plaintiff Roger Hall's Freedom of Information Act (FOIA) requests at issue in Roger Hall v. Central Intelligence Agency, Civil Action No. 98-1837 (Hall I). In addition, plaintiffs Hall and SSR will take the depositions of those CIA officers or employees best qualified to give testimony concerning

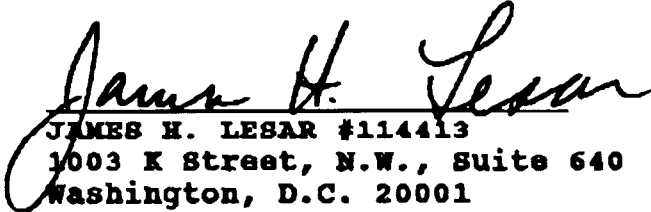
(1) the CIA's practices regarding the assessment, calculation and determination of search fees incurred in searching for records responsive to a Freedom of Information Act (FOIA) request;

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(2) the CIA's rules, regulations, guidelines and instructions regarding the assessment of search fees; and

(3) the forms or other recorded means employed by the CIA in recording search fees.

The depositions will be taken by a stenographer before a notary public of the District of Columbia on the 9th day of November, 2006, commencing at 10:00 a.m. on that date in the offices of James H. Lesar, Suite 640, 1003 K Street, N.W., Washington, D.C., and will continue from day-to-day until completed.


JAMES H. LESAR #114413
1003 K Street, N.W., Suite 640
Washington, D.C. 20001
Phone: (202) 393-1921

Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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| | : | |
| CENTRAL INTELLIGENCE AGENCY, | : | |
| | : | |
| Defendant | : | |

PLAINTIFFS' FIRST SET OF INTERROGATORIES

TO: Central Intelligence Agency
c/o AUSA Mercedeh Momeni
555 Fourth Street, N.W.
Washington, D.C. 20001

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, plaintiffs Roger Hall and Studies Solutions Results, Inc. propound the following interrogatories to defendant Central Intelligence Agency. You are required to answer or object to these interrogatories under oath within 30 days.

1. Please identify each person who participated in the search for documents responsive to the Freedom of Information Act (FOIA) requests submitted by Roger Hall which were at issue in Hall v. Central Intelligence Agency, Civil Action No. 98-1319 (Hall I).

2. Please identify each person who participated in the calculation of search costs in Hall I which initially produced a figure in excess of \$29,000.

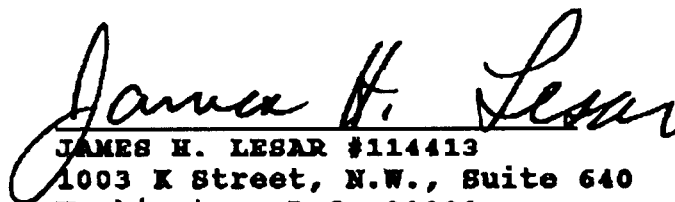
3. Please identify each person who participated in the calculation of search costs in Hall I which subsequently produced the

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figure of \$10,906.33 in search fees as reported in the CIA's Notice of March 31, 2003 Filing of Corrected Calculation of Search Fees which was filed on March 31, 2003 in Hall I.

4. Please identify each CIA employee who had contact with AUSA Rudolph Contreras regarding the amount of search costs incurred in Hall I.

5. Please list each CIA Directorate to which the Hall I requests were tasked for searching and the number of components or units of each such Directorate which received search instructions.



JAMES H. LESAR #114413
1003 K Street, N.W., Suite 640
Washington, D.C. 20001
Phone: (202) 393-1921

Counsel for Plaintiff

DATED: October 3, 2006

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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| CENTRAL INTELLIGENCE AGENCY, | : | |
| | : | |
| Defendant | : | |

PLAINTIFFS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

TO: Central Intelligence Agency
c/o AUSA Mercedeh Momeni
555 Fourth Street, N.W.
Washington, D.C. 20530

Plaintiffs Roger Hall and Studies Solutions Results, Inc., pursuant to Rule 34 of the Federal Rules of Civil Procedure requests defendant Central Intelligence Agency (CIA) to permit the inspection and copying of the following described documents in its possession, custody or control. Such production shall be made within 30 days of receipt of this request by you.

1. Sample copies of each and every form utilized by the CIA in calculating the search and copying fees incurred by a Freedom of Information Act (FOIA) requester.

2. Sample copies of each and every form utilized by the CIA which reflect the results of a search for records conducted pursuant to a FOIA request.

3. All regulations, guidelines, directives, instructions, memoranda or other form of record pertaining to the estimate,

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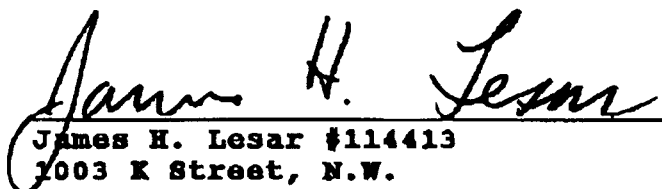
calculation and assessment of fees incurred in searching for records responsive to a FOIA request.

4. All search slips or other records pertaining to the nature of the search which were utilized in searching for the records responsive to Item 6 of plaintiffs' February 7, 2003 FOIA request.

5. All search slips or other records pertaining to the nature of the search which was conducted to locate the records which caused the CIA to reduce its original assessment of fees in Hall v. Central Intelligence Agency, C. A. No. 98-1319 (Hall I) from in excess of \$29,000 to \$10,906.33.

6. All records pertaining in any way to the recalculation of the amount of search fees incurred in Hall I from in excess of \$29,000 to \$10,906.33.

The search for records responsive to the above requests should include records of whatever format or type, including, printed, handwritten, digital or otherwise.



James H. Lesar #114413
1003 K Street, N.W.
Suite 640
Washington, D.C. 20004
Phone: (202) 393-1921

Counsel for plaintiffs Roger Hall
and Studies Solutions Results, Inc.

Dated: October 3, 2006

UNITED STATES DISTRICT COURT
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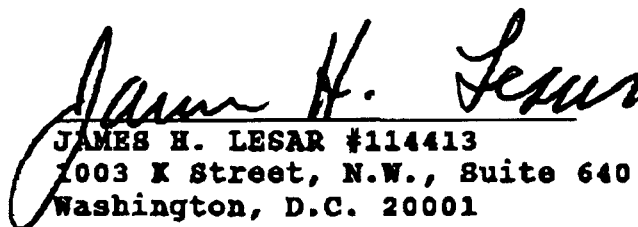
PLAINTIFFS' REQUEST FOR ADMISSIONS

TO: Central Intelligence Agency
c/o AUSA Mercedeh Momeni
555 Fourth Street, N.W.
Washington, D.C. 20001

Pursuant to Rule 36 of the Federal Rules of Civil Procedure, plaintiffs Roger Hall and Studies Solutions Results, Inc. request that defendant Central Intelligence Agency (CIA) admit the truth of the following statements.

1. There was no documentary basis for the CIA's initial statement to the Court in Roger Hall v. Central Intelligence Agency, Civil Action No. 04-0814 ("Hall I"), that the search for records responsive to plaintiff Hall's requests at issue in that case had incurred costs "in excess of \$29,000."

2. There was no documentary basis for the CIA's subsequent statement to the Court in Hall I that, correctly calculated, the search fees incurred amounted to \$10,906.33.



JAMES H. LESAR #114413
1003 K Street, N.W., Suite 640
Washington, D.C. 20001

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Phone: (202) 393-1921

Counsel for Plaintiff

DATED: October 3, 2006