

notebooks, books, brochures, studies, surveys, graphs, charts, calculations, analyses, drawings, reports, bills, invoices, checks, check stubs, clippings, computer printouts, tape recordings, photographs, videotapes, microfilm, transcripts, diary entries, desk calendar entries, appointment books, telephone message slips, telephone logs and expense reports, whether originals, copies or drafts, however produced or reproduced. Any copy of a document which contains information or markings not contained on the original of the document should be considered a separate document.

"Plaintiffs' Guantanamo travel contingent" includes all attorneys; law students, translators or interpreters, medical personnel, representatives of plaintiffs, and any other person travelling to Guantanamo Bay, Cuba, as part of any of plaintiffs' groups that have gone to Guantanamo since March 15, 1992.

II. The term "identify" when used in reference to a natural person means to:

- (A) State his/her full name and title;
- (B) State his/her present or last known business and residential address and telephone number at each address;

III. The term "identify" when used in reference to a document means to

- (A) state the date of preparation, author, title, subject matter, and type of document. If the document cannot be identified in this manner, state some other means of distinguishing the document; and

(B) state whether you are in possession or control of the document, and, if not, state the name, address and telephone number of each person who has the original or a copy of the document.

See also "Uniform Definitions in Discovery Request," Rule 47 of the Joint Civil Rules of the Southern and Eastern Districts of New York, which were adopted by this Court on December 22, 1987 and deemed incorporated by reference into all discovery requests.

INSTRUCTIONS

I. If you cannot answer any interrogatory in full after exercising due diligence to secure the information to do so, answer the interrogatory to the extent possible, explain any inability to answer, and state the information presently available to you concerning the unanswered portion.

II. If you elect to produce any document in response to one or more of these interrogatories, indicate to which interrogatory or part thereof the document responds.

III. Each interrogatory should be construed so as to make the interrogatory inclusive rather than exclusive. Thus, words importing the singular shall include the plural; words importing the plural shall include the singular; words importing the masculine gender may be applied to females; and words importing the feminine gender may be applied to males; "and" and "or" shall be construed conjunctively or disjunctively as necessary to make the interrogatory inclusive.

IV. If you refuse to answer an interrogatory, state in detail the basis for your refusal. See Standing Orders of the Court On Effective Discovery In Civil Cases Rule 21(b), Eastern District of New York.

INTERROGATORIES

The interrogatories in the instant request correspond to the simultaneously-served Defendants' Second Request for Production of Documents. As to the documents demanded in that request, provide the following information.

1. As to plaintiffs' witness Nanaaj (or "Ninaj") Raoul,
 - (a) identify all documents which the witness will use, refer to, or rely on at trial, and
 - (b) identify all other documents relating to the proposed testimony of this witness.

2. As to plaintiffs' witness Stephen Rood,
(a) identify all documents which the witness will use,
refer to, or rely on at trial, and
(b) identify all other documents relating to the
proposed testimony of this witness.

3. As to plaintiffs' witness Paul Wickham Schmidt,
(a) identify all documents which the witness will use,
refer to, or rely on at trial, and
(b) identify all other documents relating to the
proposed testimony of this witness.

4. As to plaintiffs' witness Timothy Morell,

(a) identify all documents which the witness will use, refer to, or rely on at trial, and

(b) identify all other documents relating to the proposed testimony of this witness.

5. As to plaintiffs' witness Deborah Anker,

(a) identify all documents which the witness will use, refer to, or rely on at trial, and

(b) identify all other documents relating to the proposed testimony of this witness.

6. As to plaintiffs' witness Sam Reep,

(a) identify all documents which the witness will use, refer to, or rely on at trial, and

(b) identify all other documents relating to the proposed testimony of this witness.

7. As to plaintiffs' witness Esther Cruz,

(a) identify all documents which the witness will use, refer to, or rely on at trial, and

(b) identify all other documents relating to the proposed testimony of this witness.

8. As to plaintiffs' witness Father Jacques Fabre,

(a) identify all documents which the witness will use, refer to, or rely on at trial, and

(b) identify all other documents relating to the proposed testimony of this witness.

9. As to plaintiffs' witness Rigaud Melinette,

(a) identify all documents which the witness will use, refer to, or rely on at trial, and

(b) identify all other documents relating to the proposed testimony of this witness.

10. As to plaintiffs' witness Cilliese Success,

(a) identify all documents which the witness will use, refer to, or rely on at trial, and

(b) identify all other documents relating to the proposed testimony of this witness.

11. As to plaintiffs' witness Dr. Howard Minkoff,

(a) identify all documents which the witness will use, refer to, or rely on at trial, and

(b) identify all other documents relating to the proposed testimony of this witness.

12. As to plaintiffs' witness Dr. Douglas Shensen,

(a) identify all documents which the witness will use, refer to, or rely on at trial, and

(b) identify all other documents relating to the proposed testimony of this witness.

13. As to plaintiffs' witness Dr. Robert Cohen,

(a) identify all documents which the witness will use, refer to, or rely on at trial, and

(b) identify all other documents relating to the proposed testimony of this witness.

14. State whether plaintiffs, their attorneys or agents, or any member of plaintiffs' Guantanamo travel contingent, made any video or tape recording of any Haitian or other foreign national, or of any United States Government employee or other United States citizen, or of any other person or thing in or around Guantanamo Bay, Cuba. If the answer to this Interrogatory is "yes",

- (a) identify the video or tape recording(s),
- (b) identify any person(s) who created, edited, otherwise prepared the video or tape recording(s), and
- (c) identify any person(s) who viewed or listened to the video or tape recording(s).

15. State whether plaintiffs, their attorneys or agents, or any member of plaintiffs' Guantanamo travel contingent, made any still photographs of any Haitian or other foreign national, or of any United States Government employee or other United States citizen, or of any other person or thing in or around Guantanamo Bay, Cuba. If the answer to this Interrogatory is "yes",

- (a) identify the photograph(s),
- (b) identify any person(s) who created, developed, or otherwise prepared the photograph(s), and
- (c) identify any person(s) who viewed the photograph(s).

16. State whether plaintiffs, their attorneys or agents, or any member of plaintiffs' Guantanamo travel contingent, are in possession of any video or tape recording of any Haitian or other foreign national, or of any United States Government employee or other United States citizen, or of any other person or thing in or around Guantanamo Bay, Cuba, not otherwise produced by defendants in response to discovery requests. If the answer to this Interrogatory is "yes",

- (a) identify the video or tape recording(s),
- (b) identify any person(s) who created, edited, otherwise prepared the video or tape recording(s), and
- (c) identify any person(s) who viewed or listened to the video or tape recording(s).

17. State whether plaintiffs, their attorneys or agents, or any member of plaintiffs' Guantanamo travel contingent, are in possession of any still photographs of any Haitian or other foreign national, or of any United States Government employee or other United States citizen, or of any other person or thing in or around Guantanamo Bay, Cuba, not otherwise produced by defendants in response to discovery requests. If the answer to this interrogatory is "yes",

(a) identify the photograph(s),

(b) identify any person(s) who created, developed, or otherwise prepared the photograph(s), and

(c) identify any person(s) who viewed the photograph(s).

18. State whether plaintiffs, or their attorneys or agents, made any video or tape recording of any Haitian or other foreign national, or of any United States Government employee or other United States citizen, or of any other person or thing in or around Haiti. If the answer to this Interrogatory is "yes",

(a) identify the video or tape recording(s),

(b) identify any person(s) who created, edited, otherwise prepared the video or tape recording(s), and

(c) identify any person(s) who viewed or listened to the video or tape recording(s).

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19. State whether plaintiffs, or their attorneys or agents, made any still photographs of any Haitian or other foreign national, or of any United States Government employee or other United States citizen, or of any other person or thing in or around Haiti. If the answer to this Interrogatory is "yes",

(a) identify the photograph(s),

(b) identify any person(s) who created, developed, or

otherwise prepared the photograph(s), and

(c) identify any person(s) who viewed the photograph(s).

20. State whether plaintiffs, or their attorneys or agents, are in possession of any video or tape recording of any Haitian or other foreign national, or of any United States Government employee or other United States citizen, or of any other person or thing in or around Haiti not otherwise produced by defendants in response to discovery requests. If the answer to this Interrogatory is "yes",

- (a) identify the video or tape recording(s),
- (b) identify any person(s) who created, edited, otherwise prepared the video or tape recording(s), and
- (c) identify any person(s) who viewed or listened to the video or tape recording(s).

21. State whether plaintiffs, or their attorneys or agents, are in possession of any still photographs of any Haitian or other foreign national, or of any United States Government employee or other United States citizen, or of any other person or thing in or around Haiti not otherwise produced by defendants in response to discovery requests. If the answer to this Interrogatory is "yes",

- (a) identify the photograph(s),
- (b) identify any person(s) who created, developed, or otherwise prepared the photograph(s), and
- (c) identify any person(s) who viewed the photograph(s).

Respectfully submitted,

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Dated: February 4, 1993