

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Civil Division**

STEPHEN BEHNKE, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	Case 2017 CA 005989 B
	:	
vs.	:	Judge Todd E. Edelman
	:	
DAVID H. HOFFMAN, <i>et al.</i> ,	:	Initial Conference
	:	Dec. 1, 2017, 9:30 AM
Defendants.	:	Courtroom 212

PLAINTIFFS' FIRST SET OF INTERROGATORIES

Pursuant to District of Columbia Super. Ct. Civ. R. 33, Plaintiffs hereby propound the following interrogatories to Defendant American Psychological Association (“APA”), to be answered fully, separately and in writing within 45 days after service hereof.

DEFINITIONS AND INSTRUCTIONS

1. The term “APA” refers to the American Psychological Association, together with its affiliated business entities, departments, divisions, or any other organization in which it has a management or controlling interest; its current and former directors, trustees, employees, agents, and representatives; any person over which it had or has control; or any person acting on its behalf, including David W. Ogden, Esq..

2. The terms “you” or “your” refers to the American Psychological Association, affiliated business entities, departments, divisions, or any other organization in which it has a management or controlling interest; their current and former directors, trustees, employees, agents, and representatives; any person over which they had or have control; or any person acting on their behalf, including David W. Ogden, Esq.

3. When referring to a natural person, “identify” means to state the person's full name, present or last known address, and his or her title or job function and present or last known place of employment.

4. When referring to a document, “identify” means to state the (a) type of document; (b) general subject matter; (c) date of the document; and (d) author(s), addressee(s) and recipient(s).

5. “Relating to” means referring to, dealing with, setting forth, proposing, showing, evidencing, disclosing, describing, discussing, explaining, summarizing, concerning or otherwise addressing in any way.

6. “Shared” means any exchange of information by electronic mail.

7. “Communication” means any exchange of information by any means, oral or written, including, but not limited to, telephone, regular mail, electronic mail or facsimile.

8. “Interrogatory” refers to each of the interrogatories contained herein.

9. To the extent that you object to any interrogatory on the basis of a claim of privilege, please identify fully the nature and source of the privileged material and state the nature of the claimed privilege and the basis for the claim of privilege with sufficient particularity so that a motion to compel your answer may be brought on the basis of your objection.

10. These interrogatories require supplemental or amended answers to the extent required by Super. Ct. Civ. R. 26(f), and shall be deemed to constitute continuing requests for supplemental or amended answers.

INTERROGATORIES

1. Between July 2, 2015, and July 7, 2015 (inclusive), please identify those persons associated with APA who had access to a Microsoft word file of or relating to the July 2,

2015, Hoffman Report (the July 2 Hoffman Report) that could be emailed to a third-party in an electronic format?

2. For each of those persons identified above, please identify any person, inside or outside APA, with whom that the July 2 Hoffman Report was shared between July 2, 2015, and July 7, 2015.
3. Please identify any person associated with APA who had any conversations or communications with James Risen between July 2, 2017, and July 7, 2015, inclusive.
4. Please identify how the cover letter from David H. Hoffman to the Special Committee (see attached Exhibit A) for the July 2, 2015, Hoffman Report was obtained by APA.

Dated: August 30, 2017

Respectfully submitted,

/s/ Louis J. Freeh
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FOUNDED 1866

July 2, 2015

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Re: Independent Review Report

Dear Members of the Special Committee of the APA Board of Directors,

It is my honor and pleasure to submit to you our independent review report relating to APA ethics guidelines, national security interrogations, and torture, pursuant to the November 12, 2014 resolution of the APA Board of Directors. Please do not hesitate to let me know if we can provide any further information on this matter.

Sincerely,

David H. Hoffman

DHH/clg