

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
SOUTHERN DIVISION

DANIEL G. ANDERSON; WILLIAM
COLLITON, M.D.; RICHARD P.
DELANEY, M.D.; GAETANO
MOLINARI, M.D.; RICHARD LORIA,
M.D.; LORENZO MARCOLIN, M.D.;
JAMES RONAN, M.D.; EDWARD
SHERIDAN, M.D.; EDWARD SOMA,
M.D.; and RONALD UCINSKI, M.D.,

Plaintiffs,

v.

BARACK HUSSEIN OBAMA, in his
official capacity as President of the United
States,

Defendant.

C.A. No. RJM 10-CV-0017

**PLAINTIFFS' FIRST
SET OF
INTERROGATORIES**

PLEASE TAKE NOTICE that Plaintiffs, DANIEL G. ANDERSON,
WILLIAM COLLITON, M.D., RICHARD P. DELANEY, M.D., GAETANO
MOLINARI, M.D., RICHARD LORIA, M.D., LORENZO MARCOLIN, M.D.,
JAMES RONAN, M.D., EDWARD SHERIDAN, M.D., EDWARD SOMA,
M.D., AND RONALD UCINSKI, M.D., by and through their attorney, R. Martin
Palmer, Esq. and pursuant to Fed. R. Civ. P. 33 hereby request the Defendant,
BARACK HUSSEIN OBAMA, to provide sworn answers to the following
interrogatories within 30 days of service:

DEFINITIONS AND INSTRUCTIONS

The following definitions and instructions are incorporated by reference whenever applicable in this document.

1. "You", "your" or "Defendant" as used herein, shall mean Defendant Barack Hussein Obama, in his official capacity as President of the United States, all members of the White House staff, and the President's servants, agents, employees, representatives, attorneys, and anyone acting on his behalf.

2. "Including" means including but not limited to.

3. The term "person" or "persons", as used herein, shall include any natural person, partnership, firm, corporation, trust, association, joint venture, public entity, business organization, or other legal entity.

4. The term "First Amended Complaint", as used herein, shall refer to Plaintiffs' First Amended Complaint filed in the above referenced action on January 15, 2010.

5. The term "Complaint" shall refer to Plaintiffs' Complaint filed in the above referenced action on January 15, 2010.

6. The terms "Member of the White House staff," "Servant," "Agent", "Employee", "Representative", and "Attorney" as used herein, shall refer to a former and/or current member of the White House Staff and to a former or current servant, agent, employee, representative, or attorney of Defendant.

7. In answering these interrogatories, you are required to furnish all information which is available to you, including information in the possession of your servants, agents, employees, representatives or any organization acting on your

behalf.

8. If you cannot answer any one or more of the following interrogatories in full, after exercising due diligence to secure information to do so, answer to the extent possible and specify the reason for your inability to furnish a complete answer.

9. Each interrogatory calls not only for your knowledge, but also for all knowledge that is available to you through reasonable inquiry, including inquiry of your servants , agents, employees or representative(s).

10. Pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, you must seasonably supplement or amend your answers whenever you discover new or additional information.

11. If you withhold information, based on a claim that such information is privileged, you must (a) state the exact nature of the privilege you are claiming, and (2) support your claim by describing the nature of the information you are withholding.

INTERROGATORY NO. 1:

State the full name, last known address, telephone number, occupation and/or profession, employer or business affiliation, and relationship to you of each person who has or claims to have knowledge regarding the matters alleged in Paragraphs 15 through 21 of the First Amended Complaint.

INTERROGATORY NO. 2:

With respect to any meeting that occurred between you and Senator Ben Nelson (D-Neb) that occurred in December 2009, state:

(A) the date, time and approximate length of each such meeting;

(B) all persons present during all or part of each such meeting; and

(C) each and every topic discussed at each such meeting.

INTERROGATORY NO. 3:

With respect to any meeting that occurred between you and Senator Ben Nelson (D-Neb) in December 2009, state:

(A) whether any person mentioned, brought up, and/or discussed, either by name or otherwise, Offutt Air Force Base or the Base Realignment and Closure Act list;

(B) If so, state

- a. The date and time of any such meeting;

- b. the person or persons who mentioned, brought up, and/or discussed either Offutt Air Force Base or the Base Realignment and Closure Act list , by name or otherwise;

- c. the person or persons present at the time either Offutt Air Force Base or the Base Realignment and Closure Act list was mentioned, brought up, and/or discussed, by name or otherwise, during any such meeting; and

- d. whether any memoranda, emails or other documents prepared following each such meeting mentioned Offutt Air Force Base or the Base Realignment and Closure Act list. If so, identify and produce any such documents.

INTERROGATORY NO. 4:

Since December 2009, have any further meetings occurred between you and Senator Ben Nelson (D-Neb), or have any further meetings been planned or

scheduled by you with Senator Ben Nelson (D-Neb)? If so, state

(A) the date, time and approximate length of each such meeting or scheduled meeting;

(B) all persons present, or to be present, during all or part of each such meeting; and

(C) each and every topic discussed, or that is planned to be discussed, at each such meeting.

INTERROGATORY NO. 5:

With respect to any further meetings that have occurred between you and Senator Ben Nelson (D-Neb) since December 2009, state:

(A) whether any person mentioned, brought up, and/or discussed, either by name or otherwise, Offutt Air Force Base or the Base Realignment and Closure Act list;

(B) If so, state

a. The date and time of any such meeting;

b. the person or persons who mentioned, brought up, and/or

discussed either Offutt Air Force Base or the Base Realignment and Closure Act list , by name or otherwise;

- c. the person or persons present at the time either Offutt Air Force Base or the Base Realignment and Closure Act list was mentioned, brought up, and/or discussed, by name or otherwise, during any such meeting; and

- d. whether any memoranda, emails or other documents prepared following each such meeting mentioned Offutt Air Force Base or the Base Realignment and Closure Act list. If so, identify and produce any such documents.

Respectfully submitted,



R. Martin Palmer
Law Offices of Martin Palmer
21 Summit Avenue
Hagerstown, MD 21740
(301) 790-0640
(301) 790-0684 (Facsimile)
info@martinpalmer.com
Attorney for Plaintiffs