

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

HAROLD WEISBERG,

Plaintiff,

v.

FEDERAL BUREAU OF
INVESTIGATION,
Defendant

Civil Action Nos.
78-322 and 78-420
(Consolidated)

DEFENDANT'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, the defendant hereby requests that plaintiff produce and make available for inspection and copying by defendant's counsel all of the documents specified herein.

Defendant requests that the documents be made available at the Justice Department Building, Room 3338, 10th and Constitution Avenue, N.W., Washington, D.C., no later than thirty (30) days from the date of service of this request or at such other time or place that the parties may agree upon, and that defendant's counsel be given a reasonable period of time for inspection and copying of these documents.

Instructions and Definitions

A. This request for production of documents is continuing in nature; accordingly, responses should be modified or supplemented if additional documents are subsequently obtained.

B. The term "document" means any written, recorded or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, notices, memoranda, diaries, photographs, diagrams, charts, and all other visual aids.

C. The term "interrogatory" refers to the interrogatories propounded to plaintiff in defendant's First Set of Written Interrogatories, filed simultaneously with this request for production of documents.

Production Requests

1. Produce all documents identified or described by plaintiff in his answer to interrogatory no. 1(b).

2. Produce all documents identified or described by plaintiff in his answer to interrogatory no. 2(b).
3. Produce all documents identified or described by plaintiff in his answers to interrogatory no. 3(c) and 3(d).
4. Produce all documents identified or described by plaintiff in his answers to interrogatory no. 4(e), 4(f), 4(g) and 4(h).
5. Produce all documents identified or described by plaintiff in his answers to interrogatory no. 5(f), 5(g), 5(h), 5(i) and 5(j).
6. Produce all documents identified or described by plaintiff in his answer to interrogatory no. 8(b).
7. Produce all documents identified or described by plaintiff in his answers to interrogatory no. 9(d) and 9(e).
8. Produce all documents identified or described by plaintiff in his answer to interrogatory no. 10(b).
9. Produce all documents identified or described by plaintiff in his answer to interrogatory no. 11(b).
10. Produce all documents identified or described by plaintiff in his answers to interrogatory no. 12(b) and 12(d).
11. Produce all documents identified or described by plaintiff in his answer to interrogatory no. 13(b).
12. Produce all documents identified or described by plaintiff in his answer to interrogatory no. 14.

Respectfully submitted,

J. PAUL McGRATH
Assistant Attorney General

STANLEY S. HARRIS
United States Attorney


BARBARA GORDON


HENRY J. LAHAIE

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CERTIFICATE OF SERVICE

I hereby certify on this 6th day of December, 1982, I have served the foregoing Defendant's First Set of Written Interrogatories and Defendant's First Request for Production of Documents, by hand delivery, to:

James H. Lesar, Esq.
Suite 900
1000 Wilson Boulevard
Arlington, Virginia 22209


HENRY I. LAHAIE