

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

HAROLD WEISBERG,

Plaintiff,

v.

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

FEDERAL BUREAU OF  
INVESTIGATION,

Defendant.

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DEFENDANT'S RESPONSE TO PLAINTIFF'S  
REQUEST FOR ADMISSION

The defendant, by its undersigned counsel, hereby objects to the request for admission served by plaintiff on December 18, 1982. The request, which inquires as to whether the Central Intelligence Agency asked the Federal Bureau of Investigation for information on twenty six (26) specified individuals, is clearly irrelevant to the issue before the Court -- that is, whether the FBI's search for documents in these consolidated FOIA actions was adequate. Moreover, the information sought by the request for admission falls outside the fourteen issue listed in plaintiff's Amended Statement of Genuine Issues of Material Fact in Dispute, filed on July 26, 1982. Any discovery on the adequacy of the FBI's search in these cases is limited to the fourteen enumerated issues since, under the dictates of Local Rule 1-9(h), those issues represent "all material facts as to which [plaintiff] contended there exists a genuine issue necessary to be litigated . . . ." (Emphasis added).

Respectfully submitted,

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Attorneys for Defendants.

CERTIFICATE OF SERVICE

I hereby certify on this 9th day of January, 1983, I have served the foregoing Defendant's Response To Plaintiff's Request For Admission by first class mail, postage pre-paid to:

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

  
HENRY E. LAHAIE