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6. The Agency objects to Appellant's Discovery Requests to the extent that they seek sensitivity security information protected from disclosure to non-covered parties, notwithstanding Appellant's and his counsel agreement to use such information solely in connection with this litigation.
 7. The Agency objects to Appellant's Discovery Requests to the extent that they exceed the limit of thirty in number, including all discrete subparts.
 8. The Agency reserves the right to supplement its responses herein upon further discovery.

The above general objections are hereby incorporated into each and every individually numbered response as if set forth therein.

AGENCY RESPONSES

Interrogatory No. 1.

Please provide the name, title, and position of each and every employee who drafted, prepared, reviewed and authorized the release of the text message that the Agency charges Appellant with having disclosed to the media.

The Agency objects to this request on the grounds of irrelevancy. The Agency further objects to this request on the grounds that it seeks Sensitive Security Information protected from disclosure. Without waiving these objections, the Agency responds as follows: Assistant to Special Agent in Charge Michael Lum received and followed instructions to send the subject text message.

Interrogatory No. 2.

Please identify each and every person by name, address and place of employment, who will or may be called by the Agency as a witness in this litigation, and describe specifically the area or areas of expected testimony; the documents to be relied upon, if any; and state whether the persons so designated will or will not be an expert witness, and if so state the substance of the facts and opinions to which each such expert is expected to testify and a summary of the grounds for such opinion of each expert.

The Agency may call the following individuals as witnesses in this litigation:

Frank Donzanti, Special Agent in Charge, Los Angeles Field Office for the Federal Air Marshal Service, P.O. Box 51522, Irvine, CA 92619. He is the deciding official and relies upon the Agency File and the supervisory file that he maintained on this matter.

David Graceson, Senior SSI Program Officer, 601 South 12th Street, Arlington, VA 22202, will rebut Appellant's allegations that the subject text message was not Sensitive Security Information, as described in Agency policies and regulations.

Douglas Hladky, Assistant Special Agent in Charge, Las Vegas Field Office for the Federal Air Marshal, 6380 S. Valley View Blvd. #338, Las Vegas, NV 89118. He was one of Appellant's