

SCHEDULE B

Instructions for Responding to Judiciary Committee Document Requests

1. In complying with this request, produce all responsive documents that are in your possession, custody, or control, whether held by you or your past or present agents, employees, and representatives acting on your behalf. Produce all documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.
2. Requested documents, and all documents reasonably related to the requested documents, should not be destroyed, altered, removed, transferred, or otherwise made inaccessible to the Committee.
3. In the event that any entity, organization, or individual denoted in this request is or has been known by any name other than that herein denoted, the request shall be read also to include that alternative identification.
4. All documents should be produced with Bates numbers affixed. The Bates numbers must be unique, sequential, fixed-length numbers and must begin with a prefix referencing the name of the producing party (e.g., ABCD-000001). This format must remain consistent across all productions. The number of digits in the numeric portion of the format should not change in subsequent productions, nor should spaces, hyphens, or other separators be added or deleted.
5. A cover letter should be included with each production including the following information:
 - a. List of each piece of media (hard drive, thumb drive, DVD or CD) included in the production by the unique number assigned to it, and readily apparent on the physical media.
 - b. List of fields in the order in which they are listed in the metadata load file.
 - c. Time zone in which emails were standardized during conversion (email collections only).
6. Produce documents as created or stored electronically in their original electronic format, and not printed to paper or PDF.
7. Data may be produced on CD, DVD, memory stick, USB thumb drive, hard drive, or via secure file transfer, using the media requiring the least number of deliverables. Label all media with the following:
 - a. Production date

- b. Bates range
 - c. Disk number (1 of X), as applicable
8. Documents produced in electronic format should be organized, identified, and indexed electronically.
9. Electronic document productions should be prepared according to the following standards:
- a. The production should consist of single page Tagged Image Files (“TIF”), or PDF file names.
 - b. Document numbers in the load file should match document Bates number and TIF or PDF file names.
 - c. If the production is completed through a series of multiple partial productions, field names and file order in all load files should match.
 - d. All electronic documents produced to the Committee should include the following fields of metadata specific to each document, and no modifications should be made to the original metadata:

BEGDOC, ENDDOC, TEXT, BEGATTACH, ENDATTACH, PAGECOUNT, REQNUM, CUSTODIAN, RECORDTYPE, DATE, TIME, SENTDATE, SENTTIME, BEGINDATE, BEGINTIME, ENDDATE, ENDTIME, AUTHOR, FROM, CC, TO, BCC, SUBJECT, TITLE, FILENAME, FILEEXT, FILESIZE, DATECREATED, TIMECREATED, DATELASTMOD, TIMELASTMOD, INTFILEPATH, NATIVELINK, EXCEPTION

***NOTE:** Notwithstanding instructions #4 - #9, for the initial production due on March 18, 2019, we will accept any form of Bates numbering or of electronic production that you have used in the relevant prior productions noted in the introductory paragraph of the Document Request.*

10. When you produce documents, you should identify the paragraph(s) or request(s) in the Committee’s letter to which the documents respond.
11. The fact that any other person or entity also possesses non-identical or identical copies of the same document shall not be a basis to withhold any information.
12. Pursuant to 5 U.S.C. § 552(d), the Freedom of Information Act (FOIA) and any statutory exemptions to FOIA shall not be a basis for withholding any information.
13. Pursuant to 5 U.S.C. § 552a(b)(9), the Privacy Act shall not be a basis for withholding information.

14. If compliance with the request cannot be made in full by the specified return date, compliance shall be made to the extent possible by that date. An explanation of why full compliance is not possible shall be provided along with any partial production.
15. In complying with this request, please be advised that the U.S. House of Representatives and the Committee on the Judiciary do not recognize any of the purported non-disclosure privileges associated with the common law. These include, but are not limited to, the attorney-client privilege and attorney work product protections; any purported governmental privileges such as privileges over law-enforcement sensitive disclosures or disclosures related to deliberative processes; or any purported contractual privileges, such as non-disclosure agreements.
16. In the event that a document is withheld in full or in part on the basis of an asserted privilege, provide a privilege log containing the following information concerning any such document: (a) every privilege asserted; (b) the type of document; (c) the general subject matter; (d) the date, author, addressee, and any other recipient(s); (e) the relationship of the author and addressee to each other; (f) the basis for the privilege(s) asserted; and (g) any other persons to whom the document has previously been disclosed.
17. If any document responsive to this request was, but no longer is, in your possession, custody, or control, identify the document (by date, author, subject, and recipients), and explain the circumstances under which the document ceased to be in your possession, custody, or control.
18. If a date or other descriptive detail set forth in this request referring to a document is inaccurate, but the actual date or other descriptive detail is known to you or is otherwise apparent from the context of the request, produce all documents that would be responsive based upon the correct date or other descriptive detail.
19. This request is continuing in nature and applies to any newly-discovered information and any newly obtained materials. Any record, document, compilation of data, or information not produced because it has not been located or discovered by the return date shall be produced immediately upon subsequent location or discovery.
20. Two sets of each production shall be delivered, one set to the Majority Staff and one set to the Minority Staff. Production sets shall be delivered to the Majority Staff in Room 2138 of the Rayburn House Office Building and the Minority Staff in Room 2142 of the Rayburn House Office Building.
21. In the event that any responsive documents or other materials contain classified, confidential, or law-enforcement sensitive information, please immediately contact Committee staff to discuss how to proceed.
22. Upon completion of the production, submit a written certification, signed by you or your counsel, stating that: (1) a diligent search has been completed of all documents in your

possession, custody, or control that reasonably could contain responsive documents; and
(2) all documents located during the search that are responsive have been produced to the
Committee.