

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

LIA DEVITRI, et al.,

Petitioners/Plaintiffs,

v.

CHRIS M. CRONEN, et al.,

Respondents/Defendants.

Civil Action No.17-cv-11842-PBS

**PETITIONERS/PLAINTIFFS' FIRST SET OF INTERROGATORIES
TO RESPONDENTS/DEFENDANTS**

Petitioners/Plaintiffs hereby propound the following First Set of Interrogatories to Respondents/Defendants, to be answered separately and under oath under Rule 33 of the Federal Rules of Civil Procedure.

DEFINITIONS AND INSTRUCTIONS

A. Definitions

As used herein, the identified terms or abbreviations have the following meanings:

1. “**DATE**” means the exact day, month and year, if ascertainable, or if not, the best approximation thereof (including by relationship to other events).
2. “**ICE**” means the U.S. Immigration and Customs Enforcement Agency.
3. “**INTERROGATORY**” refers to Petitioners/Plaintiffs’ First Set of Interrogatories to Respondents/Defendants in this action.
4. “**PERSON**” means any natural person, firm, corporation, partnership, proprietorship, cooperative, association, joint venture, organization, governmental body, committee, commission, group, or other entity, and any agent or employee of any of those

individual entities. Provide his or her full name, last known business address and telephone number, and last known business position or title and affiliation

5. “YOU” and “YOUR” refer to the Respondents/Defendants in this action, including all of their departments, agencies, employees and agents, and any other person or entity acting or purporting to act on their behalf, at their direction, or under their supervision.

B. Instructions

1. Use of the singular tense shall be deemed to include the plural and vice versa, and use of the masculine pronoun shall be deemed to include both genders.

2. “And” as well as “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the requests any information which might otherwise be construed to be outside their scope.

3. Answer each Interrogatory set forth below separately and completely in writing under oath. Your response hereto is to be signed and verified by the person making it, and the objections signed by the attorney making them, as required by Federal Rule of Civil Procedure 33(b).

4. In responding to these Interrogatories, furnish all information that is available to you, including information that is available to you or your counsel, or in the possession, custody or control of you or any agent of yours.

5. Each Interrogatory shall be answered fully unless it is objected to in good faith, in which event the reasons for your objection shall be stated in detail.

6. If an objection pertains to only a portion of an Interrogatory, or a word, phrase, or clause contained within it, you are required to state your objection to that portion only and to respond to the remainder of the Interrogatory, using your best efforts to do so.

7. If any Interrogatory cannot be responded to in full after exercising due diligence to secure the information, respond to the extent possible, specifying your inability to respond to the remainder and stating whatever information you have concerning the unanswered portions. If you do not know the answer to an interrogatory, identify the person or persons who would be expected to know the answer.

8. If any information is withheld by you under a claim of privilege, please set forth in your written response for each document or information for which a claim of privilege is made:

(a) Principals. The name and title of the author(s), sender(s), addressee(s), and recipient(s) of the information.

(b) Date. The date the document or information was created or transmitted.

(c) Publications. The date and title of each person to whom the contents of the information has been disclosed by copy, exhibition, reading, summarization, or otherwise.

(d) Descriptions. A description of the nature and subject matter of the information.

(e) Privilege. A statement of the privilege(s) and the basis or bases upon which the privilege(s) is or are asserted.

9. These Interrogatories are continuing in nature. Therefore, you are obligated to provide, by way of supplemental responses and documents, whatever information may hereafter be obtained by you, or by anyone on your behalf, that will supplement this request.

To minimize the burden on Respondents/Defendants, Petitioners/Plaintiffs request that updated responses can be provided on a weekly basis.

10. All responses to these Interrogatories should be produced in Microsoft Word or Excel native format. If Respondents/Defendants opt to produce records in accordance with Fed. R. Civ. P. 33(d), records should be produced in the format set forth in Exhibit A.

INTERROGATORIES

1. Please identify every Indonesian national with a final order of removal who is or was subject to an Order of Supervision issued under the authority of the Boston Field Office and/or Manchester Sub-Office from 2009 to the present, and identify which if any of them you contend was a participant in Operation Indonesian Surrender and/or Operation New Hampshire Surrender:

- A. Full name;
- B. Date of Birth;
- C. Alien Number;
- D. Date of final order of removal;
- E. Criminal history, if any;
- F. Whether an attorney or representative has filed an appearance with the Department of Homeland Security, and if so the name and contact information of that attorney or representative and the date on which he or she filed an appearance;
- G. Whether a motion to reopen has been filed and/or a stay has been granted, and the court(s) and date(s) of any such motion and/or stay;
- H. Whether the national has been subject to possible or actual detention;
- I. Emergency contact information (next of kin).

RESPONSE:

Respectfully Submitted,

PETITIONERS/PLAINTIFFS

By Their Attorneys,

/s/ Ronaldo Rauseo-Ricupero
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Dated: October 6, 2017

CERTIFICATE OF SERVICE

I hereby certify that this document was served by electronic mail upon William Silvis, Vinita B. Andrapalliyal, and Michael Celone on October 6, 2017.

/s/ Ronaldo Rauseo-Ricupero

EXHIBIT A
Electronic and Hard Copy Production Specifications for Producing Party

- Mixed production format (images for hard copy and electronic documents, except spreadsheets, presentations, audio and video files, which are to be provided in native file format)
- Black and white images as single-page, Group IV TIFFs, 300 dpi, 1 bit depth
- Color images as JPEG images, 150-300 dpi
- Concordance/Relativity image load file format (.OPT)
- Native files to include corresponding field identifying file path to the native (NATIVE FILE)
- OCR / Extracted Text at the document level and provided as a separate text file with the same naming convention as the TIFF/native, and relative file path identified in the load file (EXTRACTED TEXT)
- Metadata load file (.DAT)with the following delimiters and fields:
 - Column Delimiter:
 - Quote Delimiter:
 - New Line Delimiter:
 - Multi-Entry Delimiter:

Field Name	Description	Electronic/ Native Files	Paper/Hard Copy
Prod Beg	Bates number of the first page of a document (imaged) or the identifying number of an electronic document (native)	X	X
Prod End	Bates number of the last page of a document (imaged)		X
Prod Beg Attach	Bates range of document family - first page of parent (imaged) or identifying number of parent (native)	X	X
Prod End Attach	Bates range of document family - last page of last attachment (imaged) or identifying number of last attachment (native)	X	X
Page Count	Total number of pages in an imaged document	X	X
Custodian	Document custodian in format Last Name, First Name	X	X
Author	Author of an e-doc extracted from metadata	X	
Email From	Author of an email message	X	
Email To	Main recipient(s) of an email message	X	
Email CC	Recipient(s) of "carbon copies" of an email message	X	
Email BCC	Recipient(s) of "blind copies" of an email message	X	
Date Created	Creation date of a native e-doc	X	
Date Last Modified	Date an e-doc was last modified	X	
Date Received	Received date of an email message	X	
Date Sent	Sent date of an email message	X	
Email Subject	Subject of the email message	X	
Document Extension	File extension of native file	X	
Original Folder Path	Full path to source files (if e-doc or loose email) or folder path contained within a mailstore (if NSF or PST)	X	
Filename	Original filename of native file	X	
File Description	Description of native file program or application	X	
MD5 Hash	Unique identifier ("fingerprint")	X	
Extracted Text	Relative file path to text file containing OCR / extracted text	X	X
Native File	Relative file path created during processing to link native files to database for review	X	