189

1 Q Yes. You are still serving as the
2 attorney for Secretary Clinton. Correct?
3 **A Correct.**
4 Q Okay. So do you still have a copy of the
5 after-action memo that you created in or around
6 December of 2014 memorializing the search you did
7 for Secretary Clinton's e-mails?
8 **A I may.**
9 Q Who else has a copy of the after-action
10 memo that you provided to?
11 **A Well, it was -- it was with her**
12 **attorneys. I can't speak to who -- who kept the**
13 **memo.**
14 Q Okay. So when you're referring to "her
15 attorneys," are you just referring to Cheryl Mills
16 and David Kendall?
17 **A Yes, I'm referring to David Kendall, yes.**
18 Q Okay. Any -- any other attorneys?
19 **A Not that I can think of for this.**
20 Q Did you review your after-action memo
21 that you created in or around December of 2014 in
22 preparation for today's deposition?

190

1 MR. BREWSTER: Objection. Calls for
2 privileged information.
3 I'll instruct her not to answer.
4 Q Okay. Sitting here today, you're not
5 able to say for sure that you used the term
6 "ambassador" as a key search term to review
7 Secretary Clinton's e-mails. Is that right?
8 **A That's correct. But, again, the keywords**
9 **were really just spot checking, to make sure we**
10 **didn't miss anything in the full review that we**
11 **already went over.**
12 Q And I understand your testimony and what
13 you're saying about that. But I'm trying to get
14 an understanding of specific key -- keyword terms
15 that were used to search Secretary Clinton's
16 e-mails that are relevant to Judicial Watch's FOIA
17 request in this case.
18 Did you use "Rice" --
19 **A I did.**
20 Q -- as a search term?
21 **A I did. She was one of the names that I**
22 **searched.**

191

1 Q Okay. And how did you search for
2 Ambassador Susan Rice? How did you use that
3 search term?
4 **A Well, first, as I said, I had sorted her**
5 **Inbox by to and from so I would look at any**
6 **e-mails she had between herself and Secretary**
7 **Rice. And then I also searched for names of**
8 **senior department officials.**
9 Q So when you did this search for the names
10 of senior department officials, did you just
11 use -- use the word "Rice" alone?
12 **A I -- I couldn't tell you today. It was**
13 **five years ago.**
14 Q Okay. But that is information that you
15 have available that would be contained in the
16 after-action memo that you created in December of
17 2014.
18 MR. BREWSTER: Objection.
19 Q Is that correct?
20 MR. BREWSTER: Calls for privileged
21 information for attorney work product.
22 MS. COTCA: I'm just saying that she has

192

1 the after action -- I'm asking that -- for her to
2 confirm that she has the after-action memo that
3 she created in or around December of 2014.
4 MR. BREWSTER: Your question as phrased
5 is asking for the contents of a privileged memo.
6 MS. COTCA: No. Let me rephrase it,
7 if -- if that's the way that you're understanding
8 the question.
9 BY MS. COTCA:
10 Q My question is, would you be able to
11 determine by looking at your after-action memo
12 that you created in December of 2014 whether you
13 used the term "Rice" alone as part of the keyword
14 search?
15 MR. BREWSTER: Objection. Calls for
16 privileged information. I'm going to instruct her
17 not to answer.
18 MS. COTCA: And, again, what's the
19 privilege that you are asserting for that?
20 MR. BREWSTER: Attorney work product.
21 Q Did you use the search term "U.S.U N/W"?
22 **A Not that I recall.**