

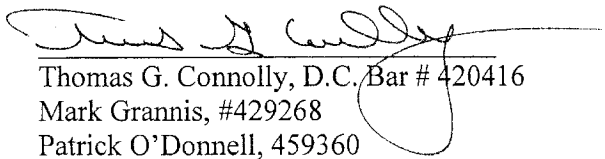
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

| | | |
|---|---|-------------------------------|
| Steven J. HATFILL, M.D., |) | |
| <i>Plaintiff</i> |) | |
| |) | Civil No. 1:03-CV-01793 (RBW) |
| v. |) | |
| |) | |
| Attorney General John ASHCROFT, Timothy |) | |
| BERES, Daryl DARNELL, Van HARP, |) | |
| the DEPARTMENT OF JUSTICE, the |) | |
| FEDERAL BUREAU OF INVESTIGATION, |) | |
| <i>et alia,</i> |) | |
| <i>Defendants.</i> |) | |

**STIPULATION REGARDING THE NUMBER OF DEPOSITIONS
OF GOVERNMENT WITNESSES IN PRIVACY ACT CLAIM**

In accordance with Federal Rule of Civil Procedure 30(a)(2)(A), the parties stipulate and agree that plaintiff Steven J. Hatfill may depose twenty current or former government employees or officials for discovery on his Privacy Act claim. Dr. Hatfill reserves the right to seek leave of the Court to take the deposition of additional government witnesses, in excess of the twenty agreed to by this stipulation, for good cause shown and consistent with the principles of Fed. R. Civ. P. 26(b)(2).

Respectfully submitted,



Thomas G. Connolly, D.C. Bar # 420416
Mark Grannis, #429268
Patrick O'Donnell, 459360
Harris, Wiltshire & Grannis, LLP
1200 18th Street, N.W.
Suite 1200
Washington, D.C. 20036
Counsel for Plaintiff



Elizabeth J. Shapiro, #418925
Alan Modlinger
Paul Freeborne
Department of Justice
Federal Programs Branch, Civil Div.
20 Massachusetts Ave., Room 7222
Washington, D.C. 20530
Counsel for Agency Defendants