

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION

DR ORLY TAITZ ESQ §  
§  
*Plaintiff,* §  
§  
v. § CIVIL ACTION NO. 1:14-CV-264  
§  
SYLVIA BURWELL, SECERTARY §  
OF HEALTH AND HUMAN SERVICES §  
*Defendant.* §

**DEFENDANT’S RULE 26(a)(1) DISCLOSURES**

To: Dr. Orly Taitz, plaintiff herein, in the above-styled and numbered cause, by and through her attorney of record:

Dr. Orly Taitz  
29839 Santa Margarita Pkwy, Ste 100  
Rancho Santa Margarita, CA 92688  
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Defendant, Sylvia Burwell, Secretary of Health and Human Services, by and through its undersigned counsel and answer make the following disclosures pursuant to Rule 26 of the Federal Rules of Civil Procedure:

1. The name, and if known, the address and telephone number of each individual likely to have discoverable information– along with the subjects of that information– that the disclosing party may use to support its claims or defenses.

CENTERS FOR DISEASE CONTROL AND PREVENTION

Kate Pearson  
Centers for Disease Control and Prevention  
1600 Clifton Road, NE  
MS C01  
Atlanta, GA 30329-4027

Health Policy Lead Kate Pearson has information regarding the search of CDC records for compliance with the FOIA request which is the subject of this litigation. She may have other information related to the incident about which Plaintiff has filed suit.

Fatih M. Washburn  
Centers for Disease Control and Prevention  
1600 Clifton Road, NE  
MS C01  
Atlanta, GA 30329-4027

Researcher III Faith M. Washburn has information regarding the search of CDC records for compliance with the FOIA request which is the subject of this litigation. She may have other information related to the incident about which Plaintiff has filed suit.

Adam Langer  
Centers for Disease Control and Prevention  
1600 Clifton Road, NE  
MS C01  
Atlanta, GA 30329-4027

Adam Langer has information regarding the search of CDC records for compliance with the FOIA request which is the subject of this litigation. He may have other information related to the incident about which Plaintiff has filed suit.

Any person identified in Disclosures, Responses to Interrogatories, and/or Expert Designations, by any party to this action during the course of discovery as a witness, trial witness, expert, person with knowledge of relevant or material facts, or someone necessary for purposes of foundation, authentication, impeachment or rebuttal. Any person identified or mentioned in any documents produced in discovery by the parties in this action. Defendants hereby cross designate any such person as individuals likely to have discoverable information that Defendants may use to support its claims or defenses.

2. A copy- or a description by category and location- of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses.

A. FOIA request by Dr. Orly Taitz

B. FOIA responsive documents

C. Affidavits from CDC personnel who conducted FOIA search

3. A computation of each category of damages claimed by the disclosing party.

Not Applicable

4. Any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Not Applicable

5. Any expert witness the United States may use at trial to present evidence.

- None.

Respectfully submitted,

KENNETH MAGIDSON  
United States Attorney

By: *s/ Lance Duke*  
LANCE DUKE  
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*Attorney in Charge for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 20<sup>th</sup> of March, 2015, a copy of the foregoing **Defendants' Rule 26(a)(1) Disclosures** was sent pursuant to the Federal Rules of Civil Procedure via email and first-class mail to the following:

*Attorney for Plaintiff*

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*s/ Lance Duke*  
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LANCE DUKE