

EXHIBIT F



U.S. Department of Justice

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July 15, 2010
San Francisco, CA

Via Email

Ms. Kori Kelley, Esq.
Morrison & Foerster LLP
2000 Pennsylvania Avenue, N.W.
Suite 6000
Washington, DC 20006

Dear Ms. Kelley,

I write in response to your letter of July 14, 2010 regarding the rule 30(b)(6) depositions covering Defendants' document searches in response to Plaintiffs' first set of requests for production that you have noticed beginning next week. As I explained over the telephone, in addition to Defendants' request for a stay of further discovery, on which grounds we objected to the depositions as reflected in my letters of June 15 and 22, 2010, the parties' discovery dispute concerning the depositions as well as the requested stay are a subject of the parties' recent meet and confer efforts. Our July 12, 2010 proposal to resolve the parties' disputes concerning those issues and the scope of further document discovery is set forth in my letter of that date, which followed the parties' June 30, 2010 meet and confer where we also discussed the issues as ordered by Judge Larson. Our July 12 proposal, to which we have not yet received a response, is consistent with Judge Larson's order that the parties meet and confer regarding all discovery disputes prior to involving the Court.

Going forward with the 30(b)(6) depositions before the parties have completed the meet and confer efforts and, if they do not succeed, Defendants are able to seek relief from the Court would improperly deprive Defendants of their objections and request for stay which they Court has stated it will not hear until after completion of the meet and confer efforts.

We also have not received a response to our objection to the deposition notice for the Department of Justice that are set forth in my previous letters. The Department of Justice is not a named party to the suit, and the first set of requests for production do not bear on the limited nature of the Plaintiffs' allegations against the Attorney General.

In addition, 30(b)(6) depositions concerning the first set of document requests would detract from our ability to get underway quickly additional document searches consistent with our July 12 proposal. And as I have also explained to Messrs. Erspamer and Vecchio, such 30(b)(6) depositions of the Department of Defense and Department of the Army would be especially burdensome because of the large scope of their search effort, which involved multiple offices at multiple locations involving multiple individuals. Written descriptions of the searches in response to the first requests for production could be another possible compromise that we are willing to explore with you, as I have stated previously.

For these reasons, the reasons set forth in my letters of June 15 and 22, 2010 and July 12, 2010, as well as because we have been in San Francisco this week for Plaintiffs' deposition of Dr. Ketchum and consequently would not have sufficient time to prepare Defendants who are in Washington for 30(b)(6) depositions starting next week, such depositions are not appropriate and we continue to object to them. If the parties' meet and confer efforts regarding the 30(b)(6) depositions, stay request and related issues described above are not successful and Defendants do not obtain a stay or other relief from the Court, then we will work with you consistent with the local rules to select mutually convenient dates for the depositions.

Sincerely,

/s/

Caroline Lewis Wolverton