

**Mark S. Zaid**

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**From:** Mark S. Zaid [mark@markzaid.com]  
**Sent:** Thursday, January 31, 2008 12:07 PM  
**To:** 'Mei, Vesper (CIV)'  
**Cc:** 'Bradley P. Moss, Esq.'; mark@markzaid.com  
**Subject:** RE: JMP v. CIA, C.A. 07-1154 (CIA regs)

Vesper –

I have reviewed the 53 documents that were released as part of this litigation.

First, as I noted last week, the CIA's letter just notes in passing that records were withheld in their entirety. That does not permit me any ability to determine whether to forgo any judicial challenge to those withholdings. Any information you can provide, such as the number of regulations and pages withheld (or even better an unclassified list of the regulations by name which would allow me the opportunity to identify those regs I believe are responsive to the FOIA request and eliminate any adequacy of search issues), would be helpful. Otherwise, we'll just simply have to challenge those withholdings and require the Agency to submit a Vaughn Index to justify its decision.

Second, with respect to any record that we are challenging, we are not challenging the withholding of individual's names (if any) or telephone/facsimile numbers. We may be willing to also forgo additional (b)(2) exemptions if you can generally – informally - describe the type of information that is at issue.

Third, we are challenging the withholdings in the following documents: MORI DocID: 1511250, 1511253, 1511256, 1511259, 1511261, 1511262, 1511264, 1511266, 1511268, 1511270, 1511271, 1511272, 1511274, 1511275, 1511281, 1511283, 1511286, 1511287, 1511288, 1511293, 1511294, 1511295, 1511296, 1511297, 1511300

Fourth, we are NOT challenging the withholdings in the following documents: MORI DocID: 1511251, 1511252, 1511254, 1511255, 1511257, 1511258, 1511260, 1511263, 1511265, 1511267, 1511269, 1511273, 1511276, 1511277, 1511278, 1511279, 1511280, 1511282, 1511284, 1511285, 1511289, 1511290, 1511291, 1511292, 1511298, 1511299, 1511301, 1511302

If you have any questions, please do not hesitate to contact me.

Mark

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