
TRANSMISSION REPORT

(THU) MAY 3 2007 17:15

BETA

DOCUMENT #	TIME STORED	TIME SENT	DURATION	PAGE(S)	MODE	RESULT
4861391-061	5. 3 17:13	5. 3 17:13	1' 26"	13	ECM	OK

DESTINATION	DST. TEL #
93015877002	93015877002



U.S. Department of Justice
 United States Attorney
 District of Columbia

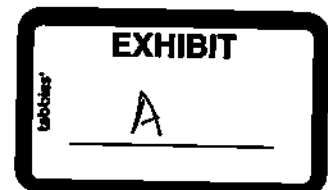
*Judiciary Center
 555 Fourth St. N.W.
 Washington, D.C. 20530*

USAO-DC
FAX
 Cover

To: Sukari Hardnett From: Rhonda Fields
 Fax: Fax: (301) 587-7002 Phone: 202-514-6970
 Date: May 3, 2007
 Re: Short v. Chertoff
 Page(s): 17:] including cover

COMMENTS:

Defendant's Discovery requests are attached



Fields, Rhonda (USADC)

From: Sukari Hardnett [s.hardnett@verizon.net]
Sent: Tuesday, June 05, 2007 5:00 PM
To: Fields, Rhonda (USADC)
Subject: RE: Short v. Chertoff CA 05-1034

I do not believe that this is at issue.

-----Original Message-----

From: Fields, Rhonda (USADC) [mailto:Rhonda.Fields@usdoj.gov]
Sent: Tuesday, June 05, 2007 4:23 PM
To: s.hardnett@verizon.net
Subject: FW: Short v. Chertoff CA 05-1034

Here is the e-mail which was sent to you on May 3, 2007. You also were sent this by fax and regular mail

From: Fields, Rhonda (USADC)
Sent: Thursday, May 03, 2007 4:21 PM
To: 's.hardnett@verizon.net'
Subject: Short v. Chertoff CA 05-1034

Attached please find the defendant's first set of interrogatories and document requests <<our discovery requests.pdf>>



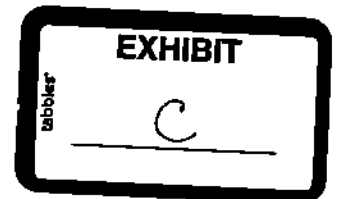
Fields, Rhonda (USADC)

From: Fields, Rhonda (USADC)
Sent: Tuesday, June 05, 2007 10:43 AM
To: Fields, Rhonda (USADC); 's.hardnett@verizon.net'
Subject: RE: Short v. Chertoff CA 05-1034

Have you sent your responses to defendant's requests for discovery to me yet?

From: Fields, Rhonda (USADC)
Sent: Thursday, May 03, 2007 4:21 PM
To: 's.hardnett@verizon.net'
Subject: Short v. Chertoff CA 05-1034

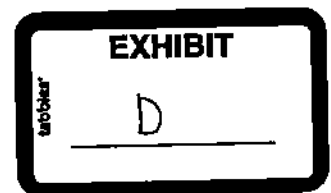
Attached please find the defendant's first set of interrogatories and document requests << File: our discovery requests.pdf >>



Fields, Rhonda (USADC)

From: Fields, Rhonda (USADC)
Sent: Tuesday, June 05, 2007 2:18 PM
To: 's.hardnett@verizon.net'
Subject: Short v. Chertoff re scheduling deposition of the defendant

Discovery closes on June 22, and I would like to schedule the plaintiff's deposition. Please let me know when you and your client can be available for a deposition between June 11-21.



Fields, Rhonda (USADC)

From: Fields, Rhonda (USADC)
Sent: Wednesday, June 06, 2007 12:12 PM
To: 's.hardnett@verizon.net'
Subject: Short v. Chertoff

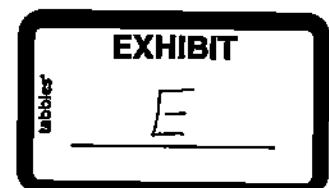
Attachments: Notice.depo.pdf

My client is not willing to consent to an extension of time for discovery. Attached please find a Notice of Deposition for



Notice.depo.pdf
(34 KB)

your client.



UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

GEORGE A. SHORT,
 Plaintiff

MICHAEL CHERTOFF, SECRETARY
UNITED STATES DEPARTMENT OF
HOMELAND SECURITY,
 Defendant

Civil Action No. 05-01034 (RMU)

RECEIPT

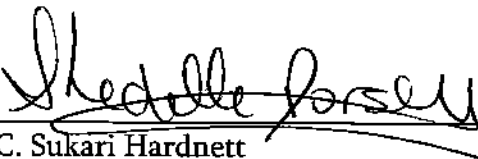
A copy of Notice of Deposition was delivered by courier to:

GEORGE SHORT, Plaintiff
C/O C. Sukari Hardnett
1111 Bonifant Street
Silver Spring, MD 20910 (tracking no. 1380463)

from Rhonda C. Fields, Assistant United States Attorney for the District of Columbia.

Enclosures

I HEREBY ACKNOWLEDGE RECEIPT OF THE ABOVE-DESCRIBED ON JUNE
6th, 2007.


C. Sukari Hardnett

1111 Bonifant Street
Silver Spring, MD 20910

Tyrell Gant
Legal Assistant




**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

<hr/>)
GEORGE A. SHORT,)
)
Plaintiff)
)
v.)
	Civil Action No. 05-01034 (RMU))
)
MICHAEL CHERTOFF, SECRETARY)
UNITED STATES DEPARTMENT OF)
HOMELAND SECURITY,)
)
Defendant)
)
<hr/>)

NOTICE OF DEPOSITION

To: GEORGE SHORT, Plaintiff
C/O C. Sukari Hardnett
1111 Bonifant Street
Silver Spring, MD 20910
Fax: (301) 587-7002
Email: s.hardnett@verizon.ne

PLEASE TAKE NOTICE that the defendant will take the deposition of George Short pursuant to Rule 30 (b) of the Federal Rules of Civil Procedure, on oral examination before a notary public or other officer authorized to administer oaths, via stenography and oral report the 13th day of June, 2007, commencing at 9:00 a.m. and continuing thereafter until the deposition is completed, at the Office of the United States Attorney for the District of Columbia, 501 3rd Street, N.W., 4th Floor, Washington, D.C. 20530.



RHONDA C. FIELDS
Assistant United States Attorney
Judiciary Center Building
555 4th Street, N.W
Washington, D.C. 20530
202/514-6970

 TRANSMISSION REPORT

(WED) JUN 6 2007 12:34
 BETA

DOCUMENT #	TIME STORED	TIME SENT	DURATION	PAGE(S)	MODE	RESULT
4861391-300	6. 6 12:34	6. 6 12:34	17"	2	ECM	OK

DESTINATION	DST. TEL #
93015877002	93015877002



U.S. Department of Justice
 United States Attorney
 District of Columbia

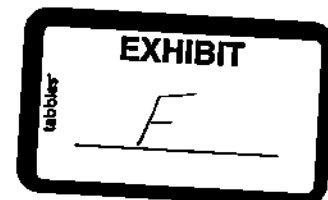
Judiciary Center
 555 Fourth St. N.W.
 Washington, D.C. 20530

USAO-DC
FAX
 Cover

To: Sukari Hardnett] From: Rhonda Firelds
 Fax: 301-587-7002 Phone: 202-514-6970
 Date: June 6, 2007
 Re: George Short
 Page(s): 2 including cover

COMMENTS:

Notice of Deposition Attached





U.S. Department of Justice
United States Attorney
District of Columbia

*Judiciary Center
555 Fourth St. N.W.
Washington, D.C. 20530*

USAO-DC
FAX
Cover

To: Sukari Hardnett] From: Rhonda Firelds
Fax: 301-587-7002 Phone: 202-514-6970
Date: June 6, 2007
Re: George Short
Page(s): 2 including cover

COMMENTS:

Notice of Deposition Attached

U.S. ATTORNEY FACSIMILE COMMUNICATION

WARNING: Information attached to this cover sheet is U.S. Government Property. If you are not the intended recipient of this information, disclosure, reproduction, distribution, or use of this information is prohibited. Please notify the originator immediately to arrange for proper disposition.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

GEORGE A. SHORT,

Plaintiff

v.

MICHAEL CHERTOFF, SECRETARY
UNITED STATES DEPARTMENT OF
HOMELAND SECURITY,

Defendant

Civil Action No. 05-01034 (RMU)

NOTICE OF DEPOSITION

To: GEORGE SHORT, Plaintiff
C/O C. Sukari Hardnett
1111 Bonifant Street
Silver Spring, MD 20910
Fax: (301) 587-7002
Email: s.hardnett@verizon.ne

PLEASE TAKE NOTICE that the defendant will take the deposition of George Short pursuant to Rule 30 (b) of the Federal Rules of Civil Procedure, on oral examination before a notary public or other officer authorized to administer oaths, via stenography and oral report the 13th day of June, 2007, commencing at 9:00 a.m. and continuing thereafter until the deposition is completed, at the Office of the United States Attorney for the District of Columbia, 501 3rd Street, N.W., 4thth Floor, Washington, D.C. 20530.



RHONDA C. FIELDS
Assistant United States Attorney
Judiciary Center Building
555 4th Street, N.W
Washington, D.C. 20530
202/514-6970

Fields, Rhonda (USADC)

From: Fields, Rhonda (USADC)
Sent: Monday, June 11, 2007 4:59 PM
To: 'Sukari Hardnett'
Subject: RE: Short v. Chertoff CA 05-1034

In our conversation you stated that you would not be available for deposition following June 14 and suggested dates in July. Those dates are beyond the cut off for discovery. As I advised you, my client will not consent to an extension of discovery. Pursuant to the local rules notice of depositions is reasonable with service 5 days in advance of the date set for deposition.

From: Sukari Hardnett [mailto:s.hardnett@verizon.net]
Sent: Monday, June 11, 2007 4:44 PM
To: Fields, Rhonda (USADC)
Subject: RE: Short v. Chertoff CA 05-1034

Enclosed you will find the letter that I suggested that you should review.

-----Original Message-----

From: Fields, Rhonda (USADC) [mailto:Rhonda.Fields@usdoj.gov]
Sent: Monday, June 11, 2007 3:45 PM
To: s.hardnett@verizon.net
Subject: RE: Short v. Chertoff CA 05-1034

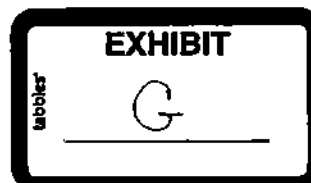
When we spoke last week, we agreed that you would send to me the responses to defendant's discovery requests by the end of last week. The response to our discovery requests has not arrived. Please e-mail or fax them to me today. My fax number is 202-514-8780. I need the documents so that I can review them before the deposition of your client on June 13.

From: Fields, Rhonda (USADC)
Sent: Tuesday, June 05, 2007 4:23 PM
To: 's.hardnett@verizon.net'
Subject: FW: Short v. Chertoff CA 05-1034

Here is the e-mail which was sent to you on May 3, 2007. You also were sent this by fax and regular mail

From: Fields, Rhonda (USADC)
Sent: Thursday, May 03, 2007 4:21 PM
To: 's.hardnett@verizon.net'
Subject: Short v. Chertoff CA 05-1034

Attached please find the defendant's first set of interrogatories and document requests << File: our discovery requests.pdf >>



Fields, Rhonda (USADC)

From: Sukari Hardnett [s.hardnett@verizon.net]
Sent: Monday, June 11, 2007 4:44 PM
To: Fields, Rhonda (USADC)
Subject: RE: Short v. Chertoff CA 05-1034
Attachments: Letter to Fields1.pdf

Enclosed you will find the letter that I suggested that you should review.

-----Original Message-----

From: Fields, Rhonda (USADC) [mailto:Rhonda.Fields@usdoj.gov]
Sent: Monday, June 11, 2007 3:45 PM
To: s.hardnett@verizon.net
Subject: RE: Short v. Chertoff CA 05-1034

When we spoke last week, we agreed that you would send to me the responses to defendant's discovery requests by the end of last week. The response to our discovery requests has not arrived. Please e-mail or fax them to me today. My fax number is 202-514-8780. I need the documents so that I can review them before the deposition of your client on June 13.

From: Fields, Rhonda (USADC)
Sent: Tuesday, June 05, 2007 4:23 PM
To: 's.hardnett@verizon.net'
Subject: FW: Short v. Chertoff CA 05-1034

Here is the e-mail which was sent to you on May 3, 2007. You also were sent this by fax and regular mail

From: Fields, Rhonda (USADC)
Sent: Thursday, May 03, 2007 4:21 PM
To: 's.hardnett@verizon.net'
Subject: Short v. Chertoff CA 05-1034

Attached please find the defendant's first set of interrogatories and document requests << File: our discovery requests.pdf >>



LAW OFFICE OF
C. SUKARI HARDNETT
1111 BONIFANT STREET
SILVER SPRING, MARYLAND 20910
s.hardnett@verizon.net
Telephone (301) 587-7001
Facsimile (301) 587-7002

June 10, 2007

VIA FACSIMILE AND ELECTRONIC & US MAIL:

Rhonda C. Fields
Assistant United States Attorney
Judiciary Center Building
555 4th Street, NW
Washington DC 20530

Re: Short v. Chertoff
Civil Action No. 05-01034 (RMU)

Dear Ms. Fields:

I am in receipt of the Notice of Deposition that you issued to take the deposition of the Plaintiff. I was quite surprised to receive your notice, for I informed you on June 6, 2007, that I am not available for depositions on June 13, 2007. I notified you of my dates of availability by telephone, and you indicated that you would get back to me. Instead at the twelfth hour, you issued a Notice of Deposition for one of the dates that I previously informed you that I was not available. Your last minute fax and delivery of the deposition notice (which notably does not have a certificate of service) does not constitute reasonable notice under Rule 30(b)(1). Please advise whether you will voluntarily withdraw your notice, or whether I will have to file an emergency motion for protective order.

If you wish to conduct the deposition of the Plaintiff then, as I already discussed with you, we will have to file a consent motion to extend the discovery deadlines to conduct the deposition on one of the dates that I informed you on which I am available. I also intend to conduct depositions of your client's 30(b)(6) designee and other agents and representatives.

Please instruct me how you wish to proceed as soon as possible.

Sincerely yours,

C. Sukari Hardnett, Esq.

TRANSMISSION REPORT

(MON) JUN 11 2007 16:56
BETA

DOCUMENT #	TIME STORED	TIME SENT	DURATION	PAGE(S)	MODE	RESULT
4861391-336	6. 11 16:55	6. 11 16:55	18"	2	ECM	OK

DESTINATION	DST. TEL #
93015877002	93015877002



U.S. Department of Justice
 United States Attorney
 District of Columbia

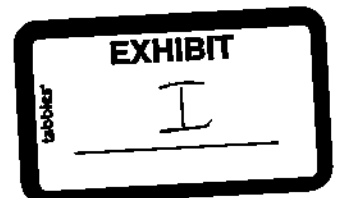
*Judiciary Center
 555 Fourth St. N.W.
 Washington, D.C. 20530*

USAO-DC
FAX
 Cover

To: C. Sukari Hardnett From: Rhonda Fields
 Fax: (301) 587-7002 Phone: 202-514-6970
 Date: June 11, 2007
 Re: Short v. Chertoff discovery responses
 Page(s): 2 including cover

COMMENTS:

Please see attached letter requesting delivery of your responses today





U.S. Department of Justice
United States Attorney
District of Columbia

*Judiciary Center
555 Fourth St. N.W.
Washington, D.C. 20530*

USAO-DC
FAX
Cover

To: C. Sukari Hardnett From: Rhonda Fields
Fax: (301) 587-7002 Phone: 202-514-6970
Date: June 11, 2007
Re: Short v. Chertoff discovery responses
Page(s): 2 including cover

COMMENTS:

Please see attached letter requesting delivery of your responses today

U.S. ATTORNEY FACSIMILE COMMUNICATION

WARNING: Information attached to this cover sheet is U.S. Government Property. If you are not the intended recipient of this information, disclosure, reproduction, distribution, or use of this information is prohibited. Please notify the originator immediately to arrange for proper disposition.



U.S. Department of Justice

Jeffrey A. Taylor
United States Attorney

District of Columbia

*Judiciary Center
555 Fourth St., N.W.
Washington, D.C. 20530*

June 11, 2007

C. Sukari Hardnett
1111 Bonifant Street
Silver Spring, MD 20910
By Fax: (301) 587-7002

Re: *Short v. Chertoff*, CA 5-1034

Dear Ms. Hardnett:


As of 3:00 pm on June 11, 2007, I have not received responses to the Interrogatories and Document Requests served on you on May 3, 2007. Last week we agreed that you would get the responses to me by the end of last week. The deposition of the plaintiff has been noticed for June 13, 2007, at 9:00 am. You have stated that you will be unavailable for depositions from June 14 until July. Discovery in this case closes on June 22, 2007.

Please PDF or fax your discovery responses to me today. My fax number is 202-514-6970. Should you fail to respond to defendant's written discovery requests, I will be forced to seek action from the Court pursuant to F.R.Civ.P. 37.

Sincerely

JEFFREY A. TAYLOR,
United States Attorney

By:



RHONDA C. FIELDS
Assistant United States Attorney
Civil Division
555 Fourth Street, N.W.
Washington, D.C. 20530
202/514/6970