

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

DEVIN G. NUNES)	
)	
Plaintiff,)	
)	
v.)	<u>Case No. 1:21-cv-00506-CJN</u>
)	
)	
WP COMPANY, LLC)	
d/b/a The Washington Post)	
<i>et al</i>)	
)	
Defendants.)	
_____)	

**PLAINTIFF’S SUPPLEMENTAL ANSWERS AND RESPONSES
TO DEFENDANTS’ DISCOVERY REQUESTS**

Plaintiff, Devin G. Nunes (“Plaintiff”), by counsel, pursuant to Rules 26(e), 33 and 34 of the Federal Rules of Civil Procedure, the Federal Rules of Evidence (“FRE”), Local Civil Rule (“LCvR”) 30.4, and the Court’s Order entered October 25, 2022, hereby serves the following Supplemental Answers and Responses to defendants, WP Company, LLC d/b/a The Washington Post (“WaPo”) and Ellen Nakashima (“Nakashima”) (WaPo and Nakashima are collectively referred to as the “Defendants”), interrogatories and request for production of documents:

1. In further response to Defendants’ interrogatories nos. 2, 3 and 15, Plaintiff states as follows:
 - a. I don’t recall any staffers traveling with me in a cab;
 - b. I only communicated with Jack Langer in preparing the March 2017 statements;

c. I only communicated with Jack Langer in creating the campaign website post about “lawsuits against The Washington Post.”

2. In further response to Defendants’ Interrogatory 16, Plaintiff states as follows:

I’m not aware of anyone aside from Jack Langer who would have relevant knowledge or documents in any repository that are relevant to the events at issue in this case, other than the documents that have already been provided by me and those individuals in response to subpoenas. I myself had no such repository, while Jack Langer had relevant communications in his House of Representatives email account and his personal gmail account, which he has provided to Defendants’ counsel. Each of the subpoena recipients had a House email account, which has been identified, to send, receive, and store relevant communications. I did not collect documents from any of these individuals’ repositories, but the Defendants subpoenaed the documents.

3. For each individual listed in paragraph (2) of the Court’s Order, Plaintiff further supplements his responses to Defendants’ first and second sets of requests for production of documents (including Requests for Production of Documents 1–41) as follows:

I’m not aware that any of those individuals have any responsive documents beyond what they have already provided in response to Defendants’ subpoenas, and I have no access to such documents or repositories. Jack Langer has provided additional documents relating to his work on the campaign website, which are being produced.

4. In response to Defendants’ Interrogatories 1 and 17, Plaintiff states as follows:

I arranged the March 21 visit with Michael Ellis. Beyond that, I have consulted with all the relevant staffers, and both they and I have provided all relevant documents, including a complete itinerary for the March 22 White House visit.

Reservation of Rights

Plaintiff reserves the right to amend and/or supplement his Objections and Responses to Defendants’ Discovery Requests.

DATED: November 8, 2022

DEVIN G. NUNES

By: /s/ Steven S. Biss

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Counsel for the Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on November 8, 2022 a copy of the foregoing was served electronically in PDF upon counsel for the Defendants.

By: /s/ Steven S. Biss

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