

**SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

STEVEN J. ROSEN,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 09-1256
)	Calendar 12
AMERICAN ISRAEL PUBLIC AFFAIRS)	Judge Erik P. Christian
COMMITTEE, INC., <i>et al.</i> ,)	
)	
Defendants.)	
)	

**INDEX TO ATTACHMENTS TO PLAINTIFF'S
STATEMENT OF GENUINE ISSUES**

The following is an index to the Attachments to Plaintiff's Statement of Genuine Issues. It is submitted as an aid to the Court's review of plaintiff's opposition to the motion for summary judgment.

<u>NO.</u>	<u>DESCRIPTION OF ATTACHMENT</u>
1	The Portions of the Transcript of the Deposition of Steven Rosen Cited in the Statement of Genuine Issues
2	The Portions of the Transcript of the Deposition of Nathan ("Nat") Lewin Cited in the Statement of Genuine Issues
3	October 4, 2004 Memorandum From Abbe Lowell (Rosen and Weissman's Attorney) To the Rosen/Weissman Files (copies to AIPAC's attorneys, including Nat Lewin) re: "Inquiry Background Facts: Revised (Last Revised September 1, 2004)" – Which is Document No. 37 in Plaintiff's Document Production to Defendant
4	October 5, 2004 Draft of "AIPAC Briefing Paper on the Allegations Reported in the Media Regarding AIPAC and Two AIPAC Employees" – Which is Document No. 38 in Plaintiff's Document Production to Defendant

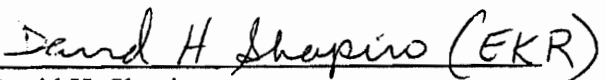
<u>NO.</u>	<u>DESCRIPTION OF ATTACHMENT</u>
5	October 18, 2004 Draft of the "Narrative Post Task Force Weekend Revisions" of a Speech AIPAC's Executive Director Howard Kohr was Planning to Give to AIPAC's Most Important Members – Which was Document No. 40 in Plaintiff's Production of Documents
6	October 15, 2004 Draft of the "Narrative Post Task Force Weekend Revisions" of a Speech AIPAC's Executive Director Howard Kohr was Planning to Give to AIPAC's Most Important Members – Which was Document No. 39 in Plaintiff's Production of Document
7	The Confidential Portions of the Transcript of the Deposition of Richard L. Fishman cited in the Statement of Genuine Issues
8	A Reprint of the Article "FBI Investigates Leak on Trade To Israel Lobby" by Stuart Auerbach from the August 3, 1984 edition of the <i>Washington Post</i> – Which was Document No. 6 in Plaintiff's Production of Documents
9	FBI Telex of March 7, 1986, From Special Agent in Charge ("SAC"), Washington Field Office re: Theft and Unauthorized Disclosure of Documents from the U.S. Trade Representative ("USTR") – Which was Document No. 133 in Plaintiff's Production of Documents
10	March 9, 2009 Letter from the Office of the U.S. Trade Representative , Executive Office of the President, to Grant Smith of the Institute for Research, Middle Eastern Policy – Which was Document No. 132 in Plaintiff's Production of Documents
11	August 13, 1984 FBI Investigative Summary re: Theft of Classified Document from USTR – Which was Document No. 137 in Plaintiff's Production of Documents
12	FBI Telex of June 20, 1984, from Washington Field Office to Director, FBI re: Theft of Classified Documents from the Office of U.S. Trade Representative ("USTR") – Which was Document No. 150 in Plaintiff's Production of Documents
13	January 6, 1986 FBI Form 302 Regarding a January 6, 1986 Interview of Female AIPAC Official – Which was Document No. 156 in Plaintiff's Production of Documents
14	March 21, 1986 FBI Form 302 re: Interview of AIPAC Official Concerning the Possession by AIPAC of a USTR Document in 1984 – Which was Document Nos. 157 in Plaintiff's Production of Documents

<u>NO.</u>	<u>DESCRIPTION OF ATTACHMENT</u>
15	January 6, 1986 FBI Form 302 re: Interview of AIPAC Official Concerning the Possession by AIPAC of a USTR Document in 1984 – Which was Document Nos. 158 in Plaintiff’s Production of Documents
16	The Confidential Portions of the Transcript of the Deposition of Ester Kurz Cited in the Statement of Genuine Issues
17	Statement of Patrick Dorton Published in the “Trial to Offer Look at World of Information Trading” Article by Neil A. Lewis in the March 3, 2008 edition of <i>The New York Times</i> – Which was Document No. 111 in Plaintiff’s Production of Documents
18	Letter from Washington: Real Insider Article “A Pro-Israel Lobby and an F.B.I. Sting” by Jeffrey Goldberg, Published in the July 4, 2005 edition of <i>The New Yorker Magazine</i> – Which was Document No. 64 in Plaintiff’s Production of Documents.
19	“U.S. Indicts 2 in Case of Divulging Secrets” Article by Dan Eggen and Jamie Stockwell, published in the August 5, 2005 edition of the <i>Washington Post</i> – Which was Document No. 68 in Plaintiff’s Production of Documents
20	March 21, 2005 Letter From Nat Lewin To Howard Kohr – which was Document No. 181 in Plaintiff’s Production of Documents
21	Superceding Indictment in <i>United States v. Lawrence Anthony Franklin, Steven J. Rosen, and Keith Weissman</i> , Criminal No. 1:05CR225 (E.D.Va.) – Originally Produced by Defendants as an Attachment to AIPAC’s Request for Admissions
22	Government’s Motion to Dismiss Criminal No. 1:05CR225 (E.D.Va.) as to Steven Rosen and Keith Weissman (May 1, 2009)
23	District Court’s Order Dismissing Criminal No. 1:05CR225 (E.D.Va.) as to Steven Rosen and Keith Weissman (May 1, 2009)
24	The Portions of the Transcript of the Deposition of Bernice Manocherian Cited in the Statement of Genuine Issues
25	The Portions of the Transcript of the Deposition of Howard Kohr Cited in the Statement of Genuine Issues

<u>NO.</u>	<u>DESCRIPTION OF ATTACHMENT</u>
26	AIPAC's \$7,000.00 Bonus Check to Plaintiff for 2004 (Dated January 31, 2005) – Which was Document No. 47 in Plaintiff's Production of Documents
27	December 15, 2007 Email From Attorney Abbe Lowell to Steve Rosen Documenting AIPAC's General Counsel, Phil Friedman, Statement on Later Making Mr. Rosen Whole – Which was Document No. 109 in Plaintiff's Production of Documents
28	The Portions of the Transcript of the Deposition of Phil Friedman Cited in the Statement of Genuine Issues
29	Bylaws of the American Israel Public Affairs Committee (Dated March 21, 1995) – Which was Document No. 14 in Plaintiff's Production of Documents
30	December 19, 2005 Letter from Jamie S. Gorelick of WilmerHale to Abbe Lowell of Chadbourne & Parke LLP, re: Indemnification of Steven Rosen – which was Document No. 134 in Plaintiff's Production of Documents
31	Check Stub from the May 12, 2005 AIPAC Check No. 061162 to Steven Rosen – which was Document No. 169 in Plaintiff's Production of Documents
32	AIPAC's Statement Regarding the Withholdings/Deductions from Severance Pay to Steven Rosen – Which was Document No. 173 in Plaintiff's Production of Documents
33	The Portions of the Transcript of the Deposition of Patrick Dorton Cited in the Statement of Genuine Issues
34	The Confidential Portions of the Transcript of the Deposition of Patrick Dorton Cited in the Statement of Genuine Issues
35	The Portions of the Transcript of the deposition of Richard Fishman Cited in the Statement of Genuine Issues
36	Reprint of the Article "Israel Lobby Reportedly Fires 2 Top Aids in Spy Inquiry," by David Johnson, published in the April 21, 2005 edition of The New York Times – which was Document No. 54 in Plaintiff's Production of Documents
37	Reprint of the Article "2 Senior AIPAC Employees Ousted," by Dan Eggen and Jerry Markon, published in the April 21, 2005 edition of the <i>Washington Post</i> – Which was Document No. 55 in Plaintiff's Production of Documents

<u>NO.</u>	<u>DESCRIPTION OF ATTACHMENT</u>
38	Reprint of the Article "This Is the FBI- Can We Talk?" published in the January 1, 2008 edition of the <i>Washingtonian</i> magazine – Originally Appended as Exhibit 12 to Defendants' Motion for Summary Judgment
39	The Portions of the Transcript of Volume II of the Deposition of Steven Rosen Cited in the Statement of Genuine Issues
40	February 24, 2005 Email from Steven Rosen to Nat Lewin (and his law partner Alyza Lewin) – Which was Document No. 30 in Plaintiff's Production of Documents
41	September 7, 2004 Fund-Raising Letter Signed by Howard Kohr, AIPAC's Executive Director, and Bernice Manocherian, AIPAC's President – Which was Document No. 36 in Plaintiff's Production of Documents
42	The Government's Consolidated Responses to Defendants' Daubert-Related and In Limine Motions, in <i>United States v. Steven J. Rosen and Keith Weissman</i> , Criminal No. 1:05CR225 (E.D.Va.) – Which was Document No. 142 in Plaintiff's Production of Documents
43	The Defendants' Motion <i>In Limine</i> to Bar Admission of the Termination of Their Employment at AIPAC, in <i>United States v. Steven J. Rosen and Keith Weissman</i> , Criminal No. 1:05CR225 (E.D.Va.) – Which was Document No. 141 in Plaintiff's Production of Documents

Respectfully submitted,



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