

Definitions and Instructions

1. The words “the well” or “the well in question” shall mean and include the well involved with the Deepwater Horizon in Federal Waters of the Gulf of Mexico in vicinity of Mississippi Canyon Block 727 on or about January 30, 2010 and which terminated in the vicinity of Mississippi Canyon Block 252 on or about April 22, 2010;
2. “DWH” shall mean and include the MODU Deepwater Horizon;
3. “Explosion” shall mean the explosion that occurred on the DWH that ultimately led to her sinking;
4. “Environment” includes but is not limited to air quality, water quality, and the quality of any water bottoms, marsh, barrier islands, beaches, or any other land masses impacted by the oil or dispersant substance.
5. “Oil” includes oil, gas, and any other substance, materials and/or components thereof which are leaking from the well.
6. The term “document” is meant to carry, without limitation, the full breadth of that term as it is used in the Federal Rules of Civil Procedure. It includes, as applicable, any memorialization, whether typed, written, recorded, printed or otherwise produced by hand, or produced by any electronic or digital process or otherwise. It includes, without limitation, agreements, contracts, letters or other correspondence, facsimile or e-mail transmissions, telephone messages, logs or records, memoranda, notes, diaries, graphs, formulas, models, bulletins, computer printouts, transcripts, analyses, returns, summaries, accounts, estimates, projections, comparisons, messages, press releases, circulars, reviews, opinions, offers, studies, photographs, investigations, questionnaires, surveys, work sheets, statistical data, reports, notebooks, manuals, charts or other graphic matter, plans, journals, ledgers, bank records, financial statements, summaries, analyses, commentary, expense reports, books, instructions, financial reports, working papers, records notes, notices, confirmations, telegrams, teletypes, interoffice or intra office communications, cables, and minutes or notations or other records of any type of any conversation, interview, telephone call, meeting, conference, discussion, or other communication. It includes any transmittal slip, attachment, appendix, or other document referenced therein. It includes, without limitation, any information contained on audiotape, videotape, microfilm, or microfiche, as well as any electronically stored information that has been created using, or is otherwise maintained on, digital repositories or other electronic media including, but not limited to, personal computers, office workstations, laptops, hard drives, handheld devices (such as Palm, Trio or Blackberry), phones (office, mobile and/or home), removable electronic storage devices (such as CDs, DVDs, and USB or thumb drives), shared network drives and servers (including e-mail and/or file servers) and back-up tapes (or other disaster recovery/archiving media).

7. The terms “including,” “includes,” and “related to” are used in the broadest sense of the term and specification of a particular matter included in a request is not meant to exclude any other documents that might be responsive to a specific request.
8. Use of either the singular or plural should not be deemed a limitation and the use of the singular should be construed, where applicable, the plural and vice versa.
9. The conjunctive form “and” and the disjunctive form “or” are meant in their inclusive sense and are meant to encompass each other where applicable.
10. References to you or to other companies are meant to include all subsidiaries and affiliates.
11. You are requested to produce all responsive documents in your possession, custody, or control, whether held by you or by past or present agents or representatives, including documents you have placed in the temporary possession, custody, or control of a third party. No documents requested herein shall be destroyed, modified, removed, transferred or otherwise made inaccessible to the Committee.
12. You are to include a copy of the original, as well as any copy that differs in any respect, such as one with marginalia or other notations. You are also to include any markings, post-it notes, or other documents attached thereto, as well as any attachment relating to or incorporated by the document.
13. With respect to any and all documents requested herein that are being withheld on the ground of privilege, furnish a list specifying the following information:
 - a. the nature, source and date of the document;
 - b. a description of the document’s subject matter;
 - c. the name and address of each recipient of the original or a copy of the document, together with the date or approximate date when each recipient received the document;
 - d. the names and addresses of all other persons to whom the contents of the document have been disclosed, the date such disclosure took place, and the means of such disclosure; and
 - e. the nature of the privilege or rule of law relied upon, including the identity of the person or persons asserting the privilege or rule as well as the legal basis for asserting that privilege or rule, or other reason for non-production.
14. Provide complete and unredacted versions, including complete paper and electronic versions. All electronic documents shall be provided in full on CD, DVD, or USB external hard drive, as well as in hard copy.
15. This document request is continuing and you shall supplement your production if you locate additional responsive documents in your possession, custody, or control.
16. Two separate sets of the documents shall be brought to 2141 Rayburn 48 hours in

advance of the hearing, one set for the Majority and one set for the Minority. Documents discovered after the hearing shall be promptly delivered to the Majority at 2138 Rayburn and to the Minority at 2142 Rayburn.