EXHIBIT G

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

STATE OF NEW YORK, *et al.*, Plaintiffs, v. UNITED STATES DEPARTMENT OF COMMERCE, *et al.*, Defendants.	No. 1:18-cv-2921 (JMF)

DEFENDANTS' RESPONSES TO PLAINTIFFS' SECOND SET OF INTERROGATORIES TO DEFENDANTS

Pursuant to Federal Rules of Civil Procedure 26, 33, and 34, Defendants United States Department of Commerce and Wilbur Ross submit these objections and responses to Plaintiffs' Second Set of Interrogatories to Defendants.

OBJECTIONS AND RESPONSES TO INTERROGATORIES

Interrogatory No. 4. With regard to the randomized controlled trials (RCTs) concerning the addition of a citizenship question to the DECENNIAL CENSUS proposed by Victoria Velkoff in or around May 2018 discussed during the August 29 deposition of the CENSUS BUREAU 30(b)(6) witness, please IDENTIFY:

a. all persons outside the CENSUS BUREAU who were aware of the proposal to conduct the RCTs; and
b. all persons involved in the decision not to conduct the RCTs.

Objections: Defendants object to the defined term "IDENTIFY" as unduly burdensome, disproportionate to the needs of the case, and resulting in multiple interrogatories. Accordingly, Defendants will provide only the names of individuals, the identities of which are clear from the materials produced in this litigation. Defendants also object to this interrogatory as vague and overbroad because the phrases "aware of" and "involved in" are undefined, and therefore Defendants object to the extent this interrogatory seeks information about meetings or conversations with

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government officials and other persons whose identities are immaterial to the claims in this litigation, and because the burden of responding is disproportionate to the needs of this case. Further, Defendants object to subparts (a) and (b) on the grounds that they are discrete interrogatories under Rule 33(a)(1).

Response: Subject to and without waiving these objections, Defendants state that the following individuals are responsive to this interrogatory:

a. Karen Dunn Kelly.

b. Karen Dunn Kelley, Ron Jarmin, Enrique Lamas

As to Interrogatories, see Verification page *infra.*

As to objections:

Dated: September 28, 2018

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CERTIFICATION OF RON JARMIN

I certify under penalty of perjury that the foregoing response to Plaintiffs' Interrogatory No. 4 is true and correct to the best of my knowledge, information, belief, understanding, and recollection.

Dated: __9/21/18_____

_____
Ron Jarmin