

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

)	
ROBERT STEINBUCH,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:05-cv-00970 (PLF)
)	Judge Paul L. Friedman
JESSICA CUTLER,)	
)	
Defendant)	
)	

EXHIBIT B TO:

**DEFENDANT’S RESPONSE IN OPPOSITION TO
PLAINTIFF’S MOTION TO AMEND COMPLAINT
AND DEFENDANT’S REQUEST FOR LEAVE
TO SUPPLEMENT PLAINTIFF’S MOTION TO DISMISS**

**CONDENSED VERSION - ALL-WORD INDEX
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

-----x
ROBERT STEINBUCH,
:
:
Plaintiff
:
v. Civil Action No.
:
1:04-CV-00188RMC
:
ROBERT KAPPELL
:
:
Defendant
:
-----x

Tuesday, September 14, 2004
Washington, D.C.

Deposition of

ROBERT ETHAN STEINBUCH

the plaintiff, called for examination by counsel
for the defendant, pursuant to notice, held at
Bradford Associates, 1050 17th Street, N.W., Suite
600, Washington, D.C., beginning at 9:33 a.m.,
before Patricia A. Edwards, a Notary Public in and
for the District of Columbia, when were present on
behalf of the respective parties:

WASHINGTON, DC
1050 17th Street, NW
Suite 600
Washington, DC 20036
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MARYLAND
51 Monroe Street
Suite 1401
Rockville, MD 20850
TEL: 301-762-1606

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2111 Wilson Boulevard
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PLEASE RESPOND TO:
2622 N. Fairfax Drive
Arlington, VA 22201
TEL: 703-525-8211
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E-MAIL: bdr@bradford.com



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1 you have any facts to support that?

2 A Well, I mean, the first thing is, I
3 don't think people stop thinking about these
4 issues when someone leaves, so I think people
5 continued to communicate even after I left.
6 Also the letter the clearance appears, based
7 on our conversation earlier today, to have
8 been after I left. So it appears that people
9 are talking about this in one form or
10 another, even after I leave.

11 Q What facts do you have that anybody
12 is talking about you, since you left the IRS,
13 other than that letter?

14 A What facts, other than the letter,
15 none come to mind. I mean, the letter
16 certainly.

17 Q What is your current professional
18 reputation, as far as you know?

19 A In the Senate?

20 Q Yes.

21 A I think it is good.

22 Q Do you have any evidence to suggest