

EXHIBIT 2

SCHEDULE A – 30(b)(6) AREAS OF INQUIRY

Definitions

“Dossier.” For purposes of this request, the term “Dossier” shall mean both the individual memos and the compilation of said memos as a unified whole. The “Dossier” refers to those memos and the compilation of such memos which were prepared by, for, at the direction or behest of, or for the benefit of Fusion GPS and which related to alleged connections between Donald Trump and Russia. For the avoidance of confusion, the term “Dossier” is intended to mean those materials widely-referred to as the “Trump Dossier,” which was published by Buzzfeed, a copy of which is attached hereto.

“December Memo.” For purposes of this request, the term “December Memo” shall mean the memo included in the Dossier dated December 13, 2016 and titled “Company Intelligence Report 2016/166.”

“Fusion GPS.” For the purposes of this request, the term “Fusion GPS” shall refer to Fusion GPS, its owners, operators, directors, officers, managers, employees, agents, contractors and freelancers.

Areas of Inquiry

1. General background concerning Fusion GPS, its ownership, the scope of its business, and the operation of the same.
2. Fusion GPS’s engagement to conduct the research that led directly or indirectly to the creation of the December Memo.
3. Fusion GPS’s client or clients in connection with the creation of the Dossier.
4. Fusion GPS’s use and/or engagement of contractors or subcontractors in connection with the Dossier.
5. The sources of information for the December Memo.
6. The hiring of Fusion GPS to compile or produce the Dossier.
7. Payments made to Fusion GPS in connection with the Dossier.
8. All steps taken by Fusion GPS, and/or those working on its behalf to obtain information that led to the creation of the December Memo.
9. The preparation of the December Memo.
10. The engagement of Christopher Steele in connection with the Dossier.
11. Fusion GPS’s efforts (or lack of efforts) to verify allegations in the December

Memo.

12. The provision of the Dossier, including the December Memo, to media outlets.
13. Communications between Fusion GPS and Buzzfeed concerning the Dossier and, in particular, the December Memo and information contained therein.
14. Communications between Fusion GPS and Ben Smith concerning the Dossier and, in particular, the December Memo and information contained therein.
15. The provision of the Dossier and/or the December memo to other third parties.
16. Communications with others concerning the Dossier and, in particular, the December Memo and the allegations contained therein.
17. Any and all information concerning Aleksej Gubarev.
18. Any and all information concerning XBT Holdings, S.A.
19. Any and all information concerning Webzilla, Inc.

SCHEDULE B – DOCUMENTS TO BE PRODUCED

Definitions

“Dossier” means both the individual memos and the compilation of said memos as a unified whole. The “Dossier” refers to those memos and the compilation of such memos which were prepared by, for, at the direction or behest of, or for the benefit of Fusion GPS and which related to alleged connections between Donald Trump and Russia. For the avoidance of confusion, the term “Dossier” is intended to mean those materials widely-referred to as the “Trump Dossier,” which was published by Buzzfeed, a copy of which is attached hereto.

“December Memo.” For purposes of this request, the term “December Memo” shall mean the memo included in the Dossier dated December 13, 2016 and titled “Company Intelligence Report 2016/166.”

“Fusion GPS” means Fusion GPS, its owners, operators, directors, officers, managers, employees, agents, contractors and freelancers.

“Concerning” means consisting of, referring to, reflecting or in any way logically or factually connected with the matter discussed. A document “concerning” a given subject is any document identifying, showing, referring to, dealing with evidencing, commenting upon, having as a subject, describing, summarizing, analyzing, explaining, detailing, outlining, defining, interpreting, or pertaining to that subject, including without limitation, documents referring to the presentation of other documents.

“Documents” means all writings or graphic matter or other means of preserving thought or expression of any kind, including the originals and all identical copies, whether different from the original by reasons of any notation made on such copies or otherwise including, without limitation, e-mails, letters, text messages, social media messages, correspondence, memoranda, notes, diaries, studies, checks, statements, receipts, returns, summaries, pamphlets, books, prospectuses, interoffice and intraoffice telephone calls, meetings or other communications, bulletins, printed matter, computer printouts, teletypes, telefax, invoices, worksheets, photographs, contracts, computer data, hard drives, correspondence, transcripts, schedules, affidavits, graphs, videotapes, tape recordings, motions pictures or other films (and all drafts, alternations, modifications, changes and amendments of any of the foregoing). It shall also include any electronically stored data on any media.

Documents Requested

1. The December Memo, in its unredacted form.
2. All documents concerning Aleksej Gubarev.
3. All documents concerning XBT Holdings, S.A.
4. All documents concerning Webzilla, Inc.

5. All communications between Fusion GPS and Buzzfeed concerning the Dossier.
6. All communications between Fusion GPS and Ben Smith concerning the Dossier.
7. All documents reflecting or relating to the sources of information concerning Aleksej Gubarev.
8. All documents reflecting or relating to the sources of information concerning XBT Holdings, Inc.
9. All documents reflecting or relating to the sources of information concerning Webzilla, Inc.
10. All communications with Christopher Steele concerning the December Memo.
11. All documents concerning the provision of the Dossier and/or the December Memo to third parties.