

REQUEST 83: Admit that Halliburton/KBR employees entered Jamie's room after she reported the rape and prior to the U.S. State Departments' involvement in the investigation.

RESPONSE:

REQUEST 84: Admit that Halliburton/KBR employees removed evidence from Jamie's room after she reported the rape and prior to the U.S. State Departments' involvement in the investigation.

RESPONSE:

REQUEST 85: Admit that Halliburton/KBR implemented a "no alcohol" policy after the report of rape by Jamie.

RESPONSE:

REQUEST 86: Admit that the Halliburton/KBR barracks in which Jamie lived at the time of the incident in question were predominantly male quarters.

RESPONSE:

REQUEST 87: Admit that Halliburton/KBR did not discipline Charles Boartz, or any of the other males present in Jamie's room on the evening of these events.

RESPONSE:

REQUEST 88: Admit that Halliburton/KBR has never disciplined a male employee for acts of alleged sexual abuse or rape following complaints of such acts by female employees in Camp Hope.

RESPONSE:

Respectfully submitted,

/s/ L. Todd Kelly
L. Todd Kelly
THE KELLY LAW FIRM, P.C.
Texas Bar No. 24035049
One Riverway, Suite 1150
Houston, Texas 77056
Tel. (713) 255-2055
Fax. (713) 523-5939

Paul Waldner
VICKERY, WALDNER & MALLIA, L.L.C.
Texas Bar No. 20679800
One Riverway, Suite 1150
Houston, Texas 77056
Tel. (713) 526-1100
Fax. (713) 523-5939

&

Stephanie M. Morris
ATTORNEY AT LAW
Member of D.C. and PA. Bars
1660 L. Street, N.W., Suite 506
Washington, D.C. 20036
Tel. (202) 536-3353
Fax. (202) 463-6328

*ATTORNEYS FOR PLAINTIFF, JAMIE JONES
AND JOSEPH DAIGLE*



CERTIFICATE OF SERVICE

I hereby certify that the following counsel of record were served with true and correct copies of the attached First Requests for Admission on this 5th day of June, 2007:

Shadow Sloan, Esq.
VINSON & ELKINS, LLP
First City Tower
1001 Fannin Street, Suite 2300
Houston, Texas 77002-6760

/s/ L. Todd Kelly