

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

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UNITED STATES OF AMERICA,)	
)	
)	
<i>Plaintiff,</i>)	
)	
v.)	No. 1:14cv969
)	(LO / TRJ)
ALL ASSETS LISTED IN ATTACHMENT A, <i>etc.</i> ,)	
)	
<i>Defendants in Rem.</i>)	
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**OBJECTIONS AND RESPONSES OF CLAIMANT
TO THE SPECIAL INTERROGATORIES**

PURSUANT TO RULES 26 and Supplemental Rule G(6)(b) of the Federal Rules of Civil Procedure, Claimant Sven Echternach objects and responds to the Special Interrogatories as follows:

OBJECTIONS TO INSTRUCTIONS AND DEFINITIONS

Claimant objects to Instructions A and E, which, in part, purport to invade protected work product and privileged attorney-client communications. Claimant objects to Instruction A (final sentence) and Instructions B and C, which purport to alter or abridge Claimant’s obligations and rights under the Rules.

SPECIFIC OBJECTIONS AND ANSWERS

1. State your current and all prior names, including aliases or nicknames, date and place of birth, all driver’s license numbers, all passport numbers and countries of issue, current address, and all addresses for the last five (5) years. For each address, please list the inclusive months and years you or your spouse lived at each address.

OBJECTION: Under Supplemental Rule G(6)(a), special interrogatories are “limited to the claimant’s identity and relationship to the defendant property.” This special interrogatory exceeds that limited scope, and Claimant will only provide his name and current address.

RESPONSE: Sven Echternach, Freiherr-vom-Stein-Str.46, 60323 Frankfurt, Germany.

2. If you have ever been arrested or convicted of a crime in any country, please state the date of the arrest or conviction, the charges, the name and address of the court in which you were convicted, the offense you were charged with or were convicted of, and the sentence or other outcome.

OBJECTION: Under Supplemental Rule G(6)(a), special interrogatories are “limited to the claimant’s identity and relationship to the defendant property.” This special interrogatory exceeds that limited scope, and Claimant will not respond.

RESPONSE: No response is being made.

3. In your claim dated August 28, 2014, you state under penalty of perjury that you are the “owner” of all funds in the HSBC 7833 account because you opened the account under your name and have maintained and operated the account. Please state the source of the funds in the HSBC account.

OBJECTION: Under Supplemental Rule G(6)(a), special interrogatories are "limited to the claimant's identity and relationship to the defendant property." This special interrogatory exceeds that limited scope.

RESPONSE: Subject to my objection—as stated in my claim, I am the owner of the account, and I am the owner of all funds deposited therein.

4. State whether you have been indicted in the United States and if so, state the offense/offenses for which you were indicted, the date of the indictment and the district in which you were indicted.

OBJECTION: Under Supplemental Rule G(6)(a), special interrogatories are "limited to the claimant's identity and relationship to the defendant property." This special interrogatory exceeds that limited scope, and Claimant will not respond.

RESPONSE: No response is being made.

5. State whether or not you have agreed to come to the United States to stand trial for any offense/offenses for which you were indicted in the United States.

OBJECTION: Under Supplemental Rule G(6)(a), special interrogatories are "limited to the claimant's identity and relationship to the defendant property." This special interrogatory exceeds that limited scope, and Claimant will not respond.

RESPONSE: No response is being made.

6. State whether or not you are currently confined or held in custody in any jurisdiction.

OBJECTION: Under Supplemental Rule G(6)(a), special interrogatories are "limited to the claimant's identity and relationship to the defendant property." This special interrogatory exceeds that limited scope, and Claimant will not respond.

RESPONSE: No response is being made.

VERIFICATION

I declare under penalty of perjury of the laws of the United States that the foregoing responses are true and correct.

EXECUTED this 23rd day of October 2014.


SVEN ECHTERNACH

Dated: October 24, 2014

Respectfully submitted,

/s/ Craig C. Reilly

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Local Counsel for Claimant Echternach

CERTIFICATE OF SERVICE

I hereby certify that on October 24, 2014, the foregoing was served electronically on the following counsel of record:

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