IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ELOUISE PEPION COBELL, et al.,	
Plaintiffs,	
v.	Case No. 1:96CV01285
	(Judge Lamberth)
GALE A. NORTON, Secretary of the Interior, et al.,	
Defendants.	

DEFENDANTS' REPLY IN SUPPORT OF MOTION FOR PARTIAL SUMMARY JUDGMENT THAT INTERIOR'S HISTORICAL ACCOUNTING PLAN COMPORTS WITH THEIR OBLIGATION TO PERFORM AN ACCOUNTING

Defendants submit this Reply to Plaintiffs' Opposition ("Opposition") to Defendants' Motion For Partial Summary Judgment That Interior's Historical Accounting Plan Comports With Their Obligation To Perform An Accounting ("Motion").

As set forth below, Plaintiffs' Opposition is based largely on the "customary statements of grievances and purple prose" that the Court cautioned "Plaintiffs would be well-advised to avoid." Order of Apr. 8, 2003, at 2 n.1. Contrary to Plaintiffs' baseless, but rhetorically-charged assertions: (1) Defendants' Statement Of Material Facts As To Which No Genuine Issue Exists For Motion For Partial Summary Judgment That Interior's Historical Accounting Plan Comports With Their Obligation To Perform An Accounting (Jan. 31, 2003) ("Statement of Undisputed Material Facts" or "Statement") complies with Local Civil Rule 7.1(h), and even if it did not, the proper remedy would be, at most, for the Court to require both parties to amend and re-file their Rule 7.1(h) Statements; (2) Plaintiffs are not entitled to an adverse inference that necessitates the

denial of Defendants' Motion or precludes Defendants from filing any further summary judgment or pre-trial dispositive motions; and (3) Defendants' experts have opined that Interior's Historical Accounting Plan is feasible and comports with Defendants' obligation to perform an accounting, as the scope of that accounting is explicated in Defendants' Motion.[1] Furthermore, Defendants respectfully observe that the legal arguments set forth in Defendants' Motion remain undisputed.

I. Defendants' Statement of Undisputed Material Facts Complies With Local Civil Rule 7.1(h), And Even If It Did Not, The Proper Remedy Would Be, At Most, For The Court To Require Both Parties To Amend and Re-File Their Statements

Plaintiffs argue that Defendants' Statement of Undisputed Material Facts fails to comply with the requirements of Local Civil Rule 7.1(h) and that Defendants' Motion for Summary Judgment should therefore be denied. See Opposition at 6-8. Contrary to Plaintiffs' assertion, however, Defendants' Statement does comply with Local Civil Rule 7.1(h). Furthermore, even if the Statement failed to comply with this Rule, the proper remedy would not be to dismiss Defendants' Motion, but rather, at most, to order both parties to amend and re-file their Statements.

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[1]Plaintiffs also argue that Defendants' Motion must be denied because it is "based on their **planned** future conduct–how they **intend** to perform the accounting." Opposition at 1 (emphasis in original). As Defendants have previously argued, they agree that the Court lacks the authority to undertake a Phase 1.5 trial for the purpose of reviewing Interior Defendants' Historical Accounting Plan and thereupon entering injunctive relief dictating how they must comply with their obligation to account to individual Indian money ("IIM") account holders. See Defendants' Motion at 1-2; Brief for the Appellants (filed Dec. 6, 2002). However, the Court's order requiring Defendants to file an accounting plan and stating its intent to hold a trial thereon, see Order of Sept. 17, 2002, reflects the Court's conclusion that the legality of "Interior's planned future conduct" is justiciable at this time. Accordingly, as in any other lawsuit, Defendants are entitled to seek summary judgment. See also Order of Oct. 17, 2002 (providing a "[d]eadline for filing summary judgment motions").

Pursuant to Local Civil Rule 7.1(h), "[e]ach motion for summary judgment shall be accompanied by a statement of material facts as to which the moving party contends there is no genuine issue, which shall include references to the parts of the record relied on to support the statement." LCvR 7.1(h). In accordance with this Rule, Defendants filed a Statement of Undisputed Material Facts in support of their Motion. Although this Statement is brief, it fully conforms with Local Civil Rule 7.1(h) because Defendants' Motion relies almost entirely on legal (and, in particular, statutory) analysis and, as a result, there are very few facts material to deciding it. While Plaintiffs insist that "there are considerable 'genuine issues' on material facts making summary judgment inappropriate," Opposition at 14, they nowhere identify what these alleged material facts might be. Indeed, despite their argument that Defendants' Statement is improper, they themselves filed a Statement that is equally brief, as it is confined to "address[ing] defendants' . . . proposed undisputed facts." Plaintiffs' Statement Of Genuine Issues In Opposition To Defendants' Motion For Partial Summary Judgment That Interior's Historical Accounting Plan Comports With Their Obligation To Perform An Accounting 34 (Apr. 18, 2003).

As Plaintiffs correctly observe, Local Civil Rule 7.1(h) serves to "isolate[] the facts that the parties assert are material, distinguish[] disputed from undisputed facts, and identif[y] the pertinent parts of the record." Opposition at 7 (quoting Gardels v. CIA, 637 F.2d 770, 773 (D.C. Cir. 1980)). In other words, "[a]s Gardels . . . intimates in its examination of the Rule's purpose, a district court judge should not be obliged to sift through hundreds of pages of depositions, affidavits, and interrogatories in order to make his own analysis and determination of what may, or may not, be a genuine issue of material disputed fact." Twist v. Meese, 854 F.2d 1421, 1425

(D.C. Cir. 1988). Because Defendants' Motion relies so heavily on legal analysis, there is simply no need for the Court to "sift through" a large record to decide it, and thus no need for Defendants to file an extensive Statement of Undisputed Material Facts with numerous citations to the record.

However, even if Defendants' Statement failed to comply with Local Civil Rule 7.1(h), the case law on which Plaintiffs themselves rely indicates that the proper remedy would not be to dismiss Defendants' Motion, but rather, at most, to order both parties to amend and re-file their Statements. In Gardels v. CIA, the D.C. Circuit held that, because the CIA had filed an "inadequate . . . Statement" pursuant to a predecessor of Local Civil Rule 7.1(h), it was "impossible for . . . [it] to determine whether genuine issues of material fact existed when summary judgment was granted." Gardels, 637 F.2d 770, 774 (D.C. Cir. 1980). Accordingly, it decided to "remand the case to the District Court so that the CIA may file a proper Rule 1-9(h) Statement." Id. Likewise, in Robertson v. American Airlines, Inc., the district court "f[ou]nd[] that the defendants' statement does not comply with Rule 56.1," which is identical to Local Civil Rule 7.1(h), but "decline[d] to adopt the plaintiff's suggestion of striking the statement and denying the defendants summary judgment. Robertson, 239 F. Supp. 2d 5, 9 (D.D.C. 2002). Instead, it determined that the proper relief was to "strike[] the defendants' motion for summary judgment, and permit[] the defendants to refile a motion that complies with the letter and spirit of the rule." Id. Accordingly, because any basis for concluding that Defendants' Rule 7.1(h) Statement is improper necessarily implies that Plaintiffs' Rule 7.1(h) Statement is also improper,[2]

[2]Plaintiffs' allegation that Defendants have filed an improper Statement does not excuse them from their obligation to file a proper one. Thus, if the Court adopts Plaintiffs' argument that Defendants' Statement failed to comply with Local Civil Rule 7.1(h), the same reasoning

the appropriate remedy for the Court would be, at most, to order both parties to amend and re-file their Statements.[3]

As the D.C. Circuit has recently emphasized, however, "this court has long recognized that the district court does not abuse its discretion by declining to invoke the requirements of the local rule in ruling on a motion for summary judgment." Burke v. Gould, 286 F.3d 513, 519-20 (D.C. Cir. 2002). Indeed, the Burke Court observed:

> [B]ecause the Local Rules 'supplement' and 'shall be construed in harmony' with the Federal Rules of Civil and Criminal Procedure, see Local Rule 1.1(a); . . . , the district court is required by Federal Rule of Civil Procedure 56(c) itself to consider the 'pleadings, depositions, answers to interrogatories, and admissions on file, together with the affidavits, if any,' in determining whether 'there is no genuine issue as to any material fact and that the moving party is entitled to a judgment as a matter of law.' Fed. R. Civ. P. 56(c); . . . . Although Local Rule 56.1 [which is identical to Local Civil Rule 7.1(h)] facilitates more precise identification of the record materials on which the parties rely, Rule 56(c) identifies the materials the court is to consider before granting summary judgment.

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would indicate that Plaintiffs' Statement–which is confined to "address[ing] defendants' . . . proposed undisputed facts," Plaintiffs' Statement at 34–is also improper.

[3]Rather than ordering the refiling of the Rule 7.1(h) Statement, some courts have addressed the problem of an improper statement by striking the statement and adopting as admitted the facts set forth in the opponent's statement. See, e.g., Jackson v. Finnegan, Henderson, Farabow, Garrett & Dunner, 101 F.3d 145, 154 (D.C. Cir. 1996) ("[Having struck Jackson's . . . statement, the district court properly deemed as admitted the material facts set forth in the law firm's . . . statement of material facts not in dispute."); Twist v. Meese, 854 F.2d 1421, 1425 (D.C. Cir. 1988) ("[I]n the absence of the statement required to be furnished by Twist, the district court did not abuse its discretion in accepting as 'admitted' the facts identified by the government in the government's statement of material facts."); cf. LCvR 7.1(h) ("In determining a motion for summary judgment, the court may assume that facts identified by the moving party in its statement of material facts are admitted, unless such a fact is controverted in the statement of genuine issues filed in opposition to the motion."). Here, however, the remedy of striking Defendants' Statement and adopting Plaintiffs' is unavailable, because any conclusion that Defendants' Statement is infirm inexorably leads to the conclusion that Plaintiffs' is as well.

Id. at 519-20 (internal citations omitted). Accordingly, the materials filed pursuant to Federal Rule of Civil Procedure 56(c), and in particular the pleadings themselves, constitute a sufficient basis for the Court to decide Defendants' Motion without requiring the parties to amend and re-file their Statements.

II. Plaintiffs Are Not Entitled To An Adverse Inference That Necessitates The Denial Of Defendants' Motion Or Precludes Defendants From Filing Any Further Summary Judgment Or Pre-Trial Dispositive Motions

Plaintiffs ask the Court "summarily [to] reject defendants' motion for [partial] summary judgment . . . because of their massive destruction of relevant trust documents and the effect of the adverse inference resulting therefrom." Opposition at 11. They then argue that, "given the wholesale lack of credibility that the persistent lies, misrepresentations and malfeasance by defendants and their counsel have hung around their own necks," the Court should adopt "a standing adverse inference" that would "preclude defendants from bringing any further . . . summary judgment or other dispositive motions." Id. at 13. As demonstrated below, these arguments are totally without merit.

Under well-established case law, a party seeking an adverse inference regarding the content of destroyed evidence must make three separate showings. First, it must demonstrate that "the party having control over the evidence . . . had an obligation to preserve it at the time it was destroyed." Kronisch v. United States, 150 F.3d 112, 126 (2d Cir. 1998). Second, it must show that the "evidence was intentionally destroyed." Id. at 127; see also Byrnie v. Cromwell, 243 F.3d 93, 107-08 (2d Cir. 2001) (noting that destruction that occurred through bad faith or gross negligence has sometimes been deemed sufficient). Third, the party requesting the adverse inference must demonstrate a "'likelihood that the destroyed evidence would have been of the

nature alleged by the party affected by its destruction.'" Byrnie, 243 F.3d at 108 (quoting Kronisch, 150 F.3d at 127). To demonstrate such a likelihood, this party must "produce 'some evidence suggesting that a document or documents relevant to substantiating his claim would have been included among the destroyed files.'" Id. (quoting Kronisch, 150 F.3d at 128). As the D.C. Circuit has cautioned, "[m]ere innuendo" is insufficient. Wyler v. Korean Air Lines Co., 928 F.2d 1167, 1174 (D.C. Cir. 1991).

As indicated by these three required showings, the party seeking an adverse inference must make them as to particular pieces of destroyed evidence and must claim a precise adverse inference regarding the content of that evidence. For example, in Kronisch, the D.C. Circuit ruled that the district court had improperly denied plaintiff an adverse inference in a suit alleging that he had been made to participate without his consent in a CIA-run program designed to test the effects of lysergic acid diethylamide (LSD). Plaintiff sought an adverse inference arising from the CIA's intentional destruction of a particular set of records–namely, those relating to this drug-testing program. Furthermore, he identified the adverse inference that he sought with precision, arguing that the destroyed "files may have contained evidence helping to substantiate plaintiff's claim that Gottlieb [a CIA agent] drugged him in Paris in 1952." Kronisch, 150 F.3d at 129.

Likewise, in Byrnie, where Plaintiff sued a school system and board of education, arguing that they failed to hire him as a part-time art teacher on the basis of age and gender discrimination, the D.C. Circuit held that the district court erred in denying plaintiff an adverse inference. Here as well, however, plaintiff identified the destroyed documents and the adverse inference he sought with precision. In particular, he pointed to: (1) "the missing application

materials of the other candidates;" (2) "the written ballot form" used by "the screening committee members . . . to rank the 21 applications to determine which applicants would receive an interview . . . , along with the tally sheet that compiled their votes;" (3) "the forms on which, . . . [e]ach Committee member independently wrote down his or her top three choices for the job opening, in order of preference, after the first round of interviews, along with the tally sheet adding up the votes;" (4) "any notes made by the interviewers in the first and second rounds of interviews–and Nappi [the school principal] testified that it was likely that such notes were made;" and (5) "the notes Nappi relied upon in drafting the summary of the hiring process that the CCHRO [Connecticut Commission on Human Rights and Opportunities] Answer [to plaintiff's complaint] was based upon." Byrnie, 243 F.3d at 107. Having thus identified a specific set of documents that were destroyed, plaintiff sought the precise adverse inference that "the destroyed documents would show unlawful discrimination." Id. at 110.

Here, Plaintiffs cannot make the three showings required to obtain an adverse inference because they do not identify which documents (or categories of documents) Defendants have destroyed and how these specific documents give rise to a particular adverse inference. Indeed, instead of identifying specific destroyed documents, Plaintiffs rely on their customary vague and unsupported allegations, referring to the unspecified "destr[uction] of vast numbers of trust documents" and "massive, systematic, and intentional destruction." Opposition at 8-9. Not surprisingly, given Plaintiffs' utter failure to identify any particular relevant documents that were destroyed, they do not (and cannot) even remotely delineate the adverse inference that they seek. Thus, rather than arguing that Defendants' destruction of (particular) documents gives rise to a particular adverse inference about the content of those (particular) documents which–when

weighed with all other evidence–requires denial of Defendants' Motion, Plaintiffs simply insist that the unspecified document destruction mandates the Motion's denial.

In sum, Plaintiffs cite case law regarding the evidentiary doctrine of the adverse inference, but the real basis for their argument is their customary rhetoric about Defendants' "inequitable attempts to gain unfair advantage." Opposition at 9. It is, however, particularly ironic that Plaintiffs cite the destruction of trust documents as proof that Defendants' Motion is inequitable, since one of the primary purposes of Interior's Historical Accounting Plan, as to which Defendants' Motion seeks partial summary judgment, is to devise an accounting that addresses the problem of missing documents–a problem of which Congress itself was fully apprised when it enacted the 1994 Act in which it mandated an accounting. See Interior's Historical Accounting Plan at III-13 ("It is certain that some gaps in the transaction history or in records and documentation will be encountered during the historical accounting. . . . Various options, including forensic accounting methods, can be used to address gaps in documentation."); H.R. Rep. No. 103-778, at 10, 30 (Oct. 3, 1994) (discussing the well-known Misplaced Trust: The Bureau of Indian Affairs' Mismanagement of the Indian Trust Fund, H.R. Rep. No. 102-499 (Apr. 22, 1992), which in turn describes, inter alia, problems with the management of IIM trust records).

That Plaintiffs' request for an "adverse inference" requiring denial of Defendants' Motion is really based on a generalized grievance, rather than the law of evidence, is suggested by their even more far-fetched assertion that the Court should adopt "a standing adverse inference" that would "preclude defendants from bringing any further . . . summary judgment or other dispositive motions." Opposition at 13. As Plaintiffs do not (and cannot) cite any authority in

support of this extraordinary request (let alone any case law concerning adverse inferences), the Court should summarily deny it.[4]

III. Defendants' Experts Have Opined that Interior's Historical Accounting Plan is Feasible And Comports With Defendants' Obligation To Perform An Accounting, As The Scope Of That Accounting Is Explicated In Defendants' Motion

Plaintiffs rely on snippets of the reports and deposition testimony of Defendants' expert accountant and historians, David Lasater, Edward Angel, and Alan Newell, to argue that Defendants lack "competent experts willing to opine that Defendants' Historical Plan will comply with their fiduciary duty to provide a complete and accurate accounting of all individual Indian trust assets." Opposition at 26.

Plaintiffs' argument, however, completely misconstrues the subject matter as to which Defendants' experts are opining. Assuming Interior's Historical Accounting Plan is feasible, the question of whether it comports with Defendants' obligation to perform an accounting is a legal one. As such, it is appropriate for summary judgment and not for the expert testimony of accountants and historians. The correctness of Defendants' various legal interpretations regarding the scope of the required accounting–such as their determination that it must be for funds held in IIM trust accounts on or after passage of the 1994 Act on October 25, 1994–is for the Court to decide. Defendants' experts are offered simply to establish that, given these legal interpretations underlying the Accounting Plan, the accounting set forth therein is feasible.

Consider, for example, Plaintiffs' assertion that "Lasater's testimony effectively refutes any notion that Defendants' Historical Plan is sufficient as a matter of law or fact to constitute

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[4]Plaintiffs' request to preclude Defendants from filing any further summary judgment or other dispositive motions is also not properly before the Court, as Plaintiffs failed to file a motion requesting such relief.

the 'all funds' accounting ordered by this Court." Opposition at 18. In support of this assertion, they note, inter alia, that Dr. Lasater testified that Interior's Plan seeks to provide accountings "'within a limited time period,'" id. at 17 (quoting Lasater Dep.), that it is a "'fair statement'" that the accounting is "'not going to be [to] all past and present Individual Indian Trust beneficiaries,'" id. at 18 (quoting Lasater Dep.), and that if there is absolutely no documentation concerning a transaction, that transaction "'is not quantifiable,'" id. (quoting Lasater Dep.). As these statements go to the legal question of the scope of the accounting set forth in Interior's Plan, they have nothing to do with the expert opinion regarding the Plan's feasibility for which Defendants offer Dr. Lasater's testimony.

As for Plaintiffs' challenges to the expert testimony of Edward Angel and Alan Newell, these are based primarily on the fact that these individuals are historians, rather than accountants. Thus, Plaintiffs argue that Dr. Angel is "utterly unschooled, incompetent and inexperienced with respect to accounting and trust matters," Opposition at 19, and that Mr. Newell "was only opining from a historian's perspective," id. at 24. This is hardly surprising, however, or detrimental to Defendants' case, since it is precisely as experts in history, rather than accounting, that Defendants have offered the testimony of Dr. Angel and Mr. Newell. Given this obvious point, Plaintiffs' strained efforts to discredit Dr. Angel and Mr. Newell by pointing to their lack of expertise regarding such concepts as what constitutes an "accurate accounting," id. at 18-19, or the meaning of "reconciliation," id. at 22-23, miss the mark.

After thus challenging Defendants' experts on irrelevant grounds, Plaintiffs cite the report of their identified "expert," Paul M. Homan, for his opinion that "Defendants' Historical Plan Does Not Comport With Their Fiduciary Obligation To Provide A Complete And Accurate

Accounting." Id. at 27. However, Mr. Homan bases this opinion on his own view of how properly to interpret the scope of the accounting required by law. Thus, for example, as Plaintiffs note, Mr. Homan opines that "[t]he DOI Historical Accounting Plan" cannot account for 'all funds' held in the Individual Indian Trust." Id. at 27 (quoting Homan Report). However, because the phrase "all funds," quoted by Mr. Homan, is language from the 1994 Act, the question of its meaning is one that necessarily involves statutory interpretation, a subject on which Mr. Homan is not qualified to offer expert testimony.

Finally, although Plaintiffs, as is their wont, remark on Defendants' alleged "temerity" and "inequitable attempts to gain unfair advantage," id. at 9, it is Plaintiffs themselves who demonstrate these characteristics in devoting half of their brief–sixteen out of twenty-nine pages–to expert reports and deposition testimony. Indeed, Plaintiffs even go so far as to criticize Defendants' Motion on the ground that "the matter to which they seek judgment is one . . . that is a subject of expert testimony where plaintiffs have already proffered cogent, contrary expert reports not addressed by Defendants' Motion." Opposition at 1 (emphasis added). The only reason that Plaintiffs are able to discuss these reports and deposition testimony in their Opposition is that they failed to file their Opposition until about two months after it was due, and then only because the Court so directed. See LCvR 7.1(b) ("Within 11 days of the date of service or at such other time as the court may direct, an opposing party shall serve and file a memorandum of points and authorities in opposition to the motion."); Order of Apr. 8, 2003 (requiring Plaintiffs to file their Opposition "no later than Friday, April 18, 2003). Defendants did not have the opportunity to discuss expert reports in their Motion because they complied with the Court's Order of October 17, 2002, which, while providing that February 28, 2002 was the

"[d]eadline for filing expert reports and for the identification of both parties' testifying experts," required all motions for summary judgment to be filed a month earlier, on January 31, 2003. See Oct. 17, 2002.

IV. The Legal Arguments Set Forth In Defendants' Motion Remain Undisputed

Plaintiffs' Opposition fails to address the legal claims that form the basis of Defendants' Motion. While Plaintiffs repeatedly assert that Interior's Historical Accounting Plan does not comport with Defendants' accounting obligation, such a blanket assertion does not constitute a legally cognizable response to Defendants' carefully explicated legal analyses; nor, indeed, do their constant references to Defendants' alleged "frauds, misrepresentations and concealments." E.g., Opposition at 11.

In particular, Plaintiffs have not disputed, inter alia, the following legal arguments set forth in Defendants' Motion: (1) the accounting required by the American Indian Trust Fund Management Reform Act of 1994 ("1994 Act") (codified as 25 U.S.C. § 4011) is an accounting of "funds" rather than "assets;" (2) the 1994 Act requires Interior Defendants to account for funds deposited after the Act of June 24, 1938; (3) the accounting required is for funds held in IIM trust accounts on or after passage of the Act on October 25, 1994, and not for IIM accounts that were distributed and closed prior to this date; (4) the statutory duty to account does not extend to funds that were never received by the United States because they were paid directly to the Indian beneficiary of the underlying trust asset; and (5) Interior Defendants are not obligated to examine the transactions in the account of a deceased predecessor of a current IIM account holder in order to provide an accounting to the current account holder.

CONCLUSION

For the foregoing reasons, Plaintiffs' Opposition to Defendants' Motion is without merit and Defendants respectfully renew their request for partial summary judgment that Interior's Historical Accounting Plan comports with their obligation to perform an accounting.

Dated: April 25, 2003

Respectfully submitted,

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CERTIFICATE OF SERVICE

I declare under penalty of perjury that, on April 25, 2003 I served the foregoing *Defendants' Reply in Support of Motion for Partial Summary Judgment That Interior's Historical Accounting Plan Comports with Their Obligation to Perform an Accounting* by facsimile in accordance with their written request of October 31, 2001 upon:

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