

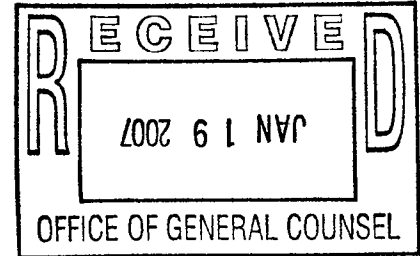
**UNITED STATES OF AMERICA  
OFFICE OF FEDERAL HOUSING ENTERPRISE OVERSIGHT**

**In the Matter of:**

**FRANKLIN D. RAINES**

**Respondent.**

**Notice Number 2006-1**



**In the matter of:**

**J. TIMOTHY HOWARD**

**Respondent.**

**In the matter of:**

**LEANNE G. SPENCER**

**Respondent.**

**RESPONDENT FRANKLIN D. RAINES'S  
REQUESTS FOR PRE-TRIAL DISCLOSURES TO  
THE OFFICE OF FEDERAL HOUSING ENTERPRISE OVERSIGHT**

Franklin D. Raines, through undersigned counsel, hereby propounds the following requests to the Office of Federal Housing Enterprise Oversight ("OFHEO") pursuant to OFHEO's Rules of Practice and Procedure, 12 C.F.R. § 1780.34. Mr. Raines requests that OFHEO produce the documents to undersigned counsel at their offices no later than February 6, 2007.

## **DEFINITIONS**

1. The terms "You" or "OFHEO" means the Office of Federal Housing Enterprise Oversight and all of its present or former officers, directors, employees, agents, individuals under its authority or control, and anyone else acting on its behalf, including but not limited to, those persons who acted or purported to act as examiners during the special examination conducted of Fannie Mae, including but not limited to, Duane Morris LLP, Deloitte Touche USA LLP, and/or other professionals.

2. The term "individual" shall refer to any individual or entity, including any agent or attorney for that individual.

3. The term "document" shall include the meaning ascribed to it in 12 C.F.R. § 1780.26(a) and is used in its broadest sense and refers to all materials and tangible objects conveying or carrying spoken, visual, or literal information, including, without limitation, the original and all copies of: all writings, drawings, graphs, charts, tables, notes, memos, photographs, videotapes, audio tapes, computer files, and computer data storage devices; all correspondence, telegrams, telexes, e-mails, and other written communications; all reports and recordings of telephone and other communications, interviews, meetings, or conversations; all appointment books, diaries, calendars, messages (including, but not limited to, reports of telephone conversations and conferences), and desk pads; all confirmations, invoices, receipts, adding machine tape, calculations, ledgers, logs, journals, books of account; all notes, memoranda, analyses, reports, studies, forecasts, work papers, and minutes of meetings; and all other writings, including drafts and copies of any of the foregoing, however denominated. Any documents with marks such as notes, initials, comments or notations of any kind made on or

attached to it should not be deemed to be identical to the one without such marks and should be produced as a separate document. Documents located on premises other than OFHEO's own are specifically included.

4. When referring to documents, the term "identify" shall mean to give, to the extent known, (i) the name of the document; (ii) the bates number of the document, if produced; (iii) the type of document; (iv) the author(s) and recipient(s) of the document.

5. When referring to a person, the term "identify" shall mean to give, to the extent known, the person's full name, present or last known address, and when referring to a natural person, additionally, the present or last known place of employment.

### **REQUESTS**

1. Identify all individuals you intend to call to testify as fact witnesses at the hearing of Notice No. 2006-1.

2. Identify the expected testimony of each individual identified in response to Request 1.

3. Identify all individuals you intend to call to testify as expert witnesses at the hearing of Notice No. 2006-1.

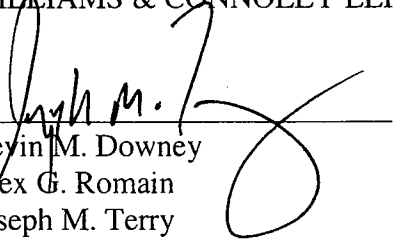
4. Identify the expected testimony of each individual identified in response to Request 3.

5. Identify all documents, including demonstrative exhibits, that you intend to introduce into evidence at the hearing of Notice No. 2006-1.

6. Produce a copy of each document identified in response to Request 5.

Respectfully Submitted,

WILLIAMS & CONNOLLY LLP



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*Counsel for Franklin D. Raines*

Dated: January 19, 2007

## CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of January 2007, I caused to be served by hand delivery a true and correct copy of Respondent Franklin D. Raines's Requests for Pre-Trial

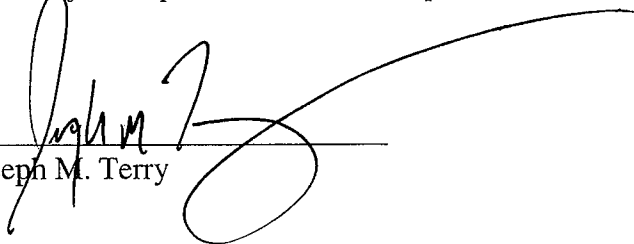
Disclosure to OFHEO on:

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Joseph M. Terry