

**BEFORE THE TRIAL CHAMBER
EXTRAORDINARY CHAMBERS IN THE COURTS OF CAMBODIA**

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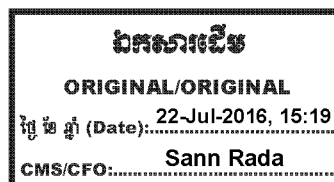
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**CO-PROSECUTORS' RESPONSE TO NUON CHEA'S RULE 87(4) REQUEST AND
RULE 93 REQUEST IN RELATION TO HENRI LOCARD (2-TCE-90)**

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I. INTRODUCTION

1. The Co-Prosecutors hereby respond to Nuon Chea’s request for the admission of two documents into evidence pursuant to Rule 87(4) and for investigative action pursuant to Rule 93 (“Request”).¹
2. The Co-Prosecutors do not object to the admission into evidence of the requested documents² pursuant to Internal Rule³ 87(4).
3. With regard to Nuon Chea’s requests for investigative action pursuant to Rule 93, the Co-Prosecutors do not object to the Trial Chamber (“Chamber”) asking expert witness Henri Locard (2-TCE-90) for a copy of his doctoral thesis.⁴ Further, as detailed below, the Co-Prosecutors note that a large number of summaries of research and witness interviews of the same or similar type as **E3/2071**⁵ requested by Nuon Chea⁶ are already on the case file and have been admitted into evidence. Additionally, the Co-Prosecutors have no objection to Locard being requested to provide the names of the witnesses he interviewed and relied on in his writings, where Locard is willing to do so, and where no confidentiality promised by Locard to his sources will be compromised.
4. However, the Co-Prosecutors submit that Nuon Chea’s request that Locard be ordered to provide further “notes and any other underlying research material he has used in preparation of his books”⁷ and “any other material related to his field research and the interviews he conducted”⁸ should be denied, as it (i) is untimely; (ii) amounts to a ‘fishing expedition’; and (iii) would result in an undue delay of proceedings.

II. ARGUMENTS

A. Rule 87(4) Requests

¹ **E415/1** Nuon Chea’s Rule 87(4) Request and Rule 93 Request in Relation to Henri Locard (2-TCE-90), 13 July 2016 (“Request”).

² **E415/1** Request, paras 9-12.

³ Internal Rules of the Extraordinary Chambers in the Courts of Cambodia, Rev. 9, 16 January 2015 (“Internal Rule(s)” or “Rule(s)”).

⁴ **E415/1** Request, para. 13.

⁵ **E3/2071** Compilation of Statement Notes Related to Prisons in the Northwest Zone, May 2007.

⁶ **E415/1** Request, para. 14.

⁷ *Ibid.*

⁸ *Ibid.*

5. The Co-Prosecutors note that the first document requested by Nuon Chea for admission, the curriculum vitae of Henri Locard,⁹ was admitted into evidence by the Chamber *proprio motu* pursuant to its decision¹⁰ issued the same day as Nuon Chea's Request. This aspect of the Request is therefore moot.
6. The Co-Prosecutors do not object to the admission of the *Cambodia Daily* article written by Locard and entitled "In Questioning of Becker, Nuon Chea's False History Prevails" (published on 17 February 2015) (the "Document") as a prior statement of a witness testifying in Case 002/02.¹¹
7. However, Nuon Chea's apparent position that Locard would be unfit to testify as an expert witness due to his "inability to fulfil his duty to testify [...] with the utmost neutrality and objectivity"¹² is misplaced. As this Chamber has already determined, challenges to the impartiality and independence of an expert witness are matters that are relevant to the weight of the evidence given by the expert, rather than to its admissibility.¹³
8. In any event, nothing in the Document "illustrates Henri Locard (2-TCE-90)'s bias" as Nuon Chea alleges.¹⁴ First, since Locard's comments in the article relate to the pre-April 1975 period, i.e. before the ECCC's temporal jurisdiction, it is not clear how it could possibly demonstrate Locard's views on the crimes with which Nuon Chea has been charged.
9. The Co-Prosecutors observe further that newspaper headlines¹⁵ are often drafted by the editor and not the article's author – a question that can be put to the expert witness during his testimony. In the body of the Document, Locard simply presents his views on two historical events: US involvement in Cambodia in the 1970-1975 period, and the

⁹ E415/1 Request, para. 9 referring to E415.1 Curriculum Vitae of Henri Locard (2-TCE-90), June 2016.

¹⁰ E406/1 Decision on the Request by the Khieu Samphan Defence to Admit into Evidence Documents Relevant to the Testimony of 2-TCE-90, 13 July 2016, para. 12 and p. 7.

¹¹ See E319/47/3 Trial Chamber Memorandum entitled "Decision on International Co-Prosecutor's Requests to Admit Written Records of Interview Pursuant to Rules 87(3) and 87(4)", 29 June 2016, para. 17; E411/1 Trial Chamber Memorandum entitled "Decision on Nuon Chea request to admit into evidence 12 prior statements of Kaing Guek Eav *alias* Duch (2-TCW-916)", 7 June 2016, paras 1, 3.

¹² E415/1 Request, para. 10.

¹³ E415 Decision on Designation of 2-TCE-90, 16 June 2016 ("Locard Designation Decision"), para. 12 *citing inter alia* E388 Designation of 2-TCE-88, 4 March 2016, paras 12, 16. See also E215 Decision on Assignment of Experts, 5 July 2012 ("Experts Decision"), para. 15.

¹⁴ E415/1 Request, para. 10.

¹⁵ In E415/1 Request, para. 10, Nuon Chea objects to the phrase "false history" in the article's headline.

circumstances concerning Prince Norodom Sihanouk's deposition in 1970. Locard is a historian. One aspect of the "extensive work and research experience"¹⁶ which the Chamber referred to when confirming his qualification as an expert is his knowledge and expertise in Cambodian history.¹⁷ It is therefore precisely because he possesses knowledge of and holds views on events such as these that he will be testifying before this Chamber.

10. While experts are obliged to testify with the utmost neutrality and objectivity,¹⁸ they are not expected to come into court without opinions – to the contrary, the value of an expert is in sharing their opinions based upon their detailed knowledge of the subject matter of their testimony. The expert of course will not be asked to opine on the guilt or innocence of the Accused – that is a matter solely for the determination of the Chamber. The views expressed in the Document do not demonstrate that the testimony given by Locard at trial will be non-neutral or biased. Indeed, Locard clearly explains the facts underlying the positions he adopts. The fact that these positions do not accord with Nuon Chea's version of events does not make Locard biased. If that were the test, then almost any witness presenting either inculpatory or exculpatory evidence would be considered biased.

B. Rule 93 Investigative Requests

11. Nuon Chea's requests for investigative action seek orders from the Chamber to Locard to produce the following documents:
- (a) a copy of his doctoral thesis entitled 'Aspects of extermination and ideology under Democratic Kampuchea (17th April 1975 – 7th January 1979)';¹⁹
 - (b) notes and any other underlying research material he has used in preparation of his books,²⁰ including notes of the type found in **E3/2071**;²¹

¹⁶ **E415** Locard Designation Decision, para. 13.

¹⁷ See **E415** Locard Designation Decision, paras 9-11.

¹⁸ **E215** Experts Decision, para. 15.

¹⁹ **E415/1** Request, para. 13 *citing* **E415.1** Curriculum Vitae of Henri Locard (2-TCE-90), June 2016, EN 01299039.

²⁰ **E415/1** Request, para. 14, *citing* at fn. 28 **E3/2419** *Prisoner of the Khmer Rouge* by Moeung Sonn with Henri Locard; **E3/2811** *The Khmer Rouge Gulag: 17 April 1975 – 7 January 1979* by Henri Locard; **E3/2812** *Le Petit Livre Rouge de Pol Pot* (Pol Pot's Little Red Book) by Henri Locard. The Co-Prosecutors note that excerpts from a further book by Henri Locard, *Pourquoi les Khmers Rouges* were admitted in July 2016. See **E406/1** Decision on Request by the Khieu Samphan Defence to Admit into Evidence Documents Relevant to the Testimony of 2-TCE-90, 13 July 2016, paras 9-11. The Co-Prosecutors have further requested the admission into evidence pursuant to Rule 87(4) of a number of chapters from the edition of the book placed

- (c) any other material related to his field research and the interviews he conducted.²²
12. With regard to the first, the Co-Prosecutors do not object to Nuon Chea's request for the Chamber to seek a copy of Locard's doctoral thesis noted in his curriculum vitae.
13. Turning to the second, Nuon Chea points to notes summarising the interviews Locard conducted in the Northwest Region of Cambodia, requesting the Chamber "to enquire whether similar notes exist for the research Henri Locard [...] conducted in other parts of Cambodia, and if they do, to order him to produce such notes."²³ The Co-Prosecutors observe that a number of other sets of summaries of research and witness interviews, produced in the same or substantially similar format as **E3/2071**, have already been placed onto the case file and admitted into evidence.²⁴ Indeed, summaries of many of the interviews Locard cites in his books are found in these notes.²⁵ As the Chamber is aware,

on the Shared Materials Drive with FR ERN 01303534-01303720. See **E415/2** Co-Prosecutors' Rule 87(4) Request to Admit Documents Relevant to the Testimony of Michael Vickery (2-TCE-94) and Henri Locard (2-TCE-90), 13 July 2016, para. 8.

²¹ **E415/1** Request, para. 14 *citing* **E3/2071** Compilation of Statement Notes Related to Prisons in the Northwest Zone, May 2007.

²² **E415/1** Request, para. 14.

²³ **E415/1** Request, para. 14.

²⁴ See **E3/2649** Report: Kampong Cham: West Bank of the Mekong (Old North Region), 5 June 2007; **E3/3209** Report by Henri Locard entitled "Bophea Region: Dambon 20 to 24"; **E3/3214-E3/3215** Report by Henri Locard entitled "S-21 and Phnom Penh under DK", 11 July 2007; **E3/3218** Report by Henri Locard entitled "Kompong Thom – Uddor Region Sector or Zone 43", 2 June 2007; **E3/3232** Report by Henri Locard entitled "Niredey region"; **E3/3237** Report by Henri Locard entitled "Democratic Kampuchea Prison Network in West Region: Pachoem", May 2007; **E3/3255** Report by Henri Locard entitled "Northeast: Eisan Region – Zones – Sectors 101, 102, 104, 105, 107, 505, Provinces of Ratanakiri, Mondulkiri, Stung Treng and Kratie", 14 June 2007; **E3/3265** Report by Henri Locard entitled "Stung Treng: Dambon 104 and 103", 16 June 2007; **E3/3274** Report by Henri Locard entitled "Kratieh – 505: Special Zone", 24 June 2007; **E3/3863** Report on Siem Reap Province: New North Zone, 30 May 2007; **E3/3244** Report by Henri Locard entitled "Preah Vihear: Sector or Zone 103", 31 May 2007; **E3/3219** Report by Henri Locard entitled "Northeast: Eisan Region – Zone-Sector 105, Mondolkiri", 27 June 2007. See also **E3/8299** Tramkak District in the grip of the Khmer Rouge, by Henri Locard, December 1996.

²⁵ See, for example, **E3/2811** *The Khmer Rouge Gulag*, EN 00394590, FR 00796292, KH 00822572 (Note 8: "K.S., né en 1943, interviewé à Takhmau, le 15 août 1992") corresponds to **E3/3232** Report by Henri Locard entitled "Niredey region", EN 00217634-00217637 ("Takhmau-city, Kandal province, zone 33; *Investigated on 15th August 1992* [...] **Witness: Kung Suon**, born 1943"); EN 00394601, FR 00796293, KH 00822588 (Note 28(EN/KH)/29(FR): "P.C.S., né en 1954, interviewé à Siemreap le 22 juillet 1992" (EN/KH 22/07/91)) corresponds to **E3/3863** Report on Siem Reap Province: New North Zone, EN 00164153-00164160 ("**Witness: Pé Chuy Chip Saê**, born in March 1954 [...] *interviewed in Siemreap Grand Hotel on 22nd July 1991*"); EN 00394601, FR 00796293, KH 00822588 (Note 26(EN/KH)/27(FR): "K.C., né en 1950, interviewé à Prey Veng le 8 décembre 1993") corresponds to **E3/3209** Report by Henri Locard entitled "Bophea Region: Dambon 20 to 24", EN 00403156-00403159 ("Prey Veng Province [...] *Investigated in 8-10th December 1993*; **Witness: Ket Chhean**, born in 1950") and **E3/2812** *Pol Pot's Little Red Book*, EN 00394947, FR 00395096 (Note 23(EN)/76(FR): "Interview of P.H., born in 1951, carried out in Phnom Penh in July 1995") corresponds to **E3/2649** Report: Kampong Cham: West Bank of the Mekong (Old North

these reports were initially prepared for the Office of the Co-Prosecutors (“OCP”), and the Co-Prosecutors are not aware of any other reports of this type.

14. Additionally, the Co-Prosecutors have no objection to Locard being requested to provide the *names* of the witnesses he interviewed and relied on in his writings, where Locard is willing to do so, and where no confidentiality promised by Locard to his sources will be compromised.²⁶ Such information can assist the Parties in providing context to other evidence, particularly as there is always the possibility that the same individuals have provided other interviews to the Office of the Co-Investigating Judges or other researchers.
15. With regard to the remaining investigative requests, Co-Prosecutors observe that, pursuant to Rule 93(1), the Chamber *may* conduct additional investigations that it finds *necessary*.²⁷ The decision whether to do so is therefore expressly left to the Chamber’s discretion. The Co-Prosecutors submit that it would not be a prudent use of the Chamber’s time and resources to conduct further investigations into seeking to acquire “the notes and any other underlying research material [Locard] has used in preparation of his books” or “any other material related to [Locard’s] field research and the interviews he conducted” for the following reasons.

(i) The requests are untimely

16. The Parties were informed by the Chamber more than 13 weeks before Nuon Chea’s Request, on 8 April 2016, that Locard would testify.²⁸ Moreover, Nuon Chea has been aware of Locard’s proposed evidence in Case 002/02 since at least May 2014, when the

Region), EN 00208404-00208410 (“Witness: Phoeuk Heang, born in 1951 [...] *Interviewed in Phnom Penh on 2 & 16 July 1995.*”).

²⁶ See *Semanza*, ICTR-97-20-A, Appeals Chamber, Judgment, 20 May 2005, para. 305; *Karemera et al.*, ICTR-98-44-T, Trial Chamber, Decision on Joseph Nzirorera’s Motion to Limit the Scope of Testimony of Expert Witnesses Alison Des Forges and Andre Guichaoua, 21 August 2007, para. 5; *Bizimungu et al.*, ICTR-99-50-T, Trial Chamber, Decision on Defence Motion for Exclusion of Portions of Testimony of Expert Witness Dr. Alison Des Forges, 2 September 2005, para. 31. See also *Taylor*, SCSL-03-1-T, Trial Chamber, Decision on the Defence Motion for the Disclosure of the Identity of a confidential ‘source’ raised during cross-examination of TF1-355, 6 March 2009; *Brđanin and Talić*, IT-99-36-AR73.9, Appeals Chamber, Decision on Interlocutory Appeal, 11 December 2002.

²⁷ Emphasis added.

²⁸ Email from the Trial Chamber Senior Legal Officer to the Parties entitled “Internal Purges: list of witnesses, Civil Parties and experts”, 8 April 2016 at 10.44am (**Annex 1**). The precise scheduling of Locard’s testimony was provided in an Email from the Trial Chamber Senior Legal Officer to the Parties entitled “Hearing schedule after judicial recess”, 30 June 2016 at 2.12pm (**Annex 2**).

OCP proposed to call him as an expert.²⁹ Indeed, the Chamber selected Locard to testify in Case 002/01, though ultimately decided to defer calling him until Case 002/02.³⁰ Locard's books *Prisoner of the Khmer Rouge*, *The Khmer Rouge Gulag* and *Pol Pot's Little Red Book*, in which he already describes his methodology and the use of source material,³¹ were placed on the Case 002 case file in 2012.³²

17. Nuon Chea has thus long been aware that Locard would testify as an expert witness, and that his books are based in part on original source material. He has had ample opportunity to request the material he now seeks.

(ii) The requests are overly broad

18. The requests for “the notes and any other underlying research material [Locard] has used in preparation of his books” and “any other material related to his field research and the interviews he conducted” are ill-defined and so overly broad as to amount to a ‘fishing expedition’.³³ In requesting the Chamber to obtain this material, Nuon Chea relies on jurisprudence that is inapplicable in the present circumstances.³⁴ Expert reports at the International Criminal Tribunal for the former Yugoslavia (“ICTY”) and the International

²⁹ **E301/2/1.1** Annex A: Co-Prosecutors trial plan and tentative witness list for Case 002/02, 11 December 2013, EN 00965524; **E305/6.1** Annex I: Co-Prosecutors' combined witness, civil party and expert list for Case 002/02 in recommended order of trial segments and appearance, 9 May 2014, EN 00986545; **E305/6.2** Annex II: OCP updated witness, civil party and expert lists, 9 May 2014, EN 00986563; **E305/6.4** Annex III: OCP updated witness, civil party and expert summaries, 9 May 2014, EN 00986615; **E307/3/2.2** Annex I: Co-Prosecutors' revised combined, witness, civil party and expert list for Case 002/02 in recommended order of trial segments and appearance, 28 July 2014, EN 01003004.

³⁰ **E172/24** Trial Chamber Memorandum entitled “Updated information regarding scheduling of proposed experts”, 25 May 2012; **E215** Experts Decision, para. 3; **E312** Final Decision on Witnesses, Experts and Civil Parties to be Heard in Case 002/01, 7 August 2014, para. 58; **E312.2** Annex II: Individuals requested by the parties in relation to Case 002/01 but not ultimately heard before the Trial Chamber, 7 August 2014, EN 01004774.

³¹ See, for example, **E3/2419** Henri Locard, *Prisoner of the Khmer Rouge*, EN 00293534-00293537 and footnotes, FR 01300643-01300645 and footnotes; **E3/2811** *The Khmer Rouge Gulag*, EN 00394583, 00394585, 00394592, 00394606-00394610 and footnotes; FR 00796261, 00796263, 00796269, 00796283-00796289, 00796292-00796294; **E3/2812** *Pol Pot's Little Red Book*, EN 00394623, 00394626-00394627, 00394652-00394653, 00394660, 00394940-00394956, FR 00394975, 00394979, 00394994-00394995, 00395001-00395002 and footnotes. With regard to *Pourquoi les Khmers Rouges*, see FR 01303707-01303718.

³² **E185/1.3** Annex C – Decision on objections to documents proposed to be put before the Chamber in Co-Prosecutors' Annexes A6-A11 and A14-A20 and by the other parties, 3 December 2012, EN 00884527 (**E3/2811** *The Khmer Rouge Gulag* and **E3/2812** *Pol Pot's Little Red Book*), 00884498 (**E3/2419** *Prisoner of the Khmer Rouge*).

³³ See **E294/1** Decision on Nuon Chea Request to admit new documents, to initiate an investigation and to summons Mr. Rob Lemkin, 24 July 2013, para. 23.

³⁴ **E415/1** Request, paras 6-8.

Criminal Court are prepared with agreed parameters of a requesting party or chamber for a specific case. Locard's independent academic research for the purposes of his books – partly the basis of his designation as an expert by the Chamber³⁵ – is not analogous. Moreover, while relying on this jurisprudence, Nuon Chea fails to note that the ICTY requires parties to file any challenge to the qualifications or the report/statement of an expert “[w]ithin thirty days of disclosure of the statement and/or report of the expert witness”.³⁶

19. The rationale underpinning Nuon Chea's Requests would mean that all experts called before the Chamber would be required to provide every piece of underlying research material that supports their expert opinion. This would clearly undermine the purpose of calling experts and would prohibitively delay proceedings. In any event, Nuon Chea will be entitled to put questions to Locard regarding his methodology and sources during his testimony.
20. Nuon Chea's implicit position that an expert's opinion based on unnamed sources cannot be relied upon is contradicted by his failure to request sources from experts he himself has requested. Until last week, Michael Vickery was scheduled to testify as an expert in this trial segment. His writing on Cambodia is substantially based on sources he refers to only by initials in his book in order to maintain confidentiality.³⁷ Yet Nuon Chea made no request for the Chamber to force Vickery to disclose the names of his sources.

(iii) The requests, if granted, would unduly delay proceedings

21. As this Chamber has already confirmed, its discretion under Rule 93 must be understood in the context of the ECCC legal framework, which guarantees the Accused's right to a fair and expeditious trial and grants the President the discretion to exclude any proceedings that unnecessarily delay the trial.³⁸

³⁵ E415 Locard Designation Decision, paras 9, 11.

³⁶ International Criminal Tribunal for the former Yugoslavia, Rules of Procedure and Evidence, IT/32/Rev.50, 8 July 2015, Rule 94bis(B).

³⁷ E3/1757 Michael Vickery, *Cambodia 1975-1982*.

³⁸ E294/1 Decision on Nuon Chea's Request to Admit New Documents, to Initiate an Investigation and to Summons Mr. Rob Lemkin, 24 July 2013, para. 11; Law on the Establishment of the Extraordinary Chambers in the Courts of Cambodia (“ECCC Law”), article 33new; Internal Rule 85.

22. Locard first came to Cambodia in 1964,³⁹ and has been conducting field research here since the early 1990s.⁴⁰ Given that Locard “interview[ed] hundreds of witnesses throughout the country”⁴¹ and analysed a large number of documents from and about security centres across Cambodia,⁴² as well as wide-ranging primary and secondary sources⁴³ for the purposes of his field work, the sum of his research material likely would amount to several thousands of pages, if not more, and it is clear that collating it would be a time-consuming process. Additionally, Locard would likely have to contact many individual sources to ask whether their name could be used before releasing source material. Even when collated and disclosed, the process of translating such records into all the ECCC’s official languages, and of the Parties reviewing them, would likely extend for months.
23. This Chamber has previously expressed concern – with reference to the age of the accused and other uncertainties⁴⁴ – that a similarly broad investigation request by Nuon Chea would not be completed within a reasonable period, based on the amount of time it would take the Parties to review the information and for it to be translated.⁴⁵ That Nuon Chea has also indicated that he would need time to “assess first, the veracity of Henri Locard (2-TCE-90)’s assertions, and second, whether any of the documents should be tendered into evidence pursuant to Rule 87(4) of the IR”,⁴⁶ further demonstrates how the requests – which fail to show how the fairness of the proceedings are or could be affected – would impede the Chamber’s obligation to guarantee an expeditious trial.⁴⁷ The frequent and lengthy breaks in the trial schedule requested by the Defence teams over the last year for

³⁹ **E415.1** Curriculum Vitae of Henri Locard (2-TCE-90), June 2016, EN 01299039.

⁴⁰ *Ibid.* See also **E415** Locard Designation Decision, para. 9 and the series of reports authored by Henri Locard detailed in fn. 24 above.

⁴¹ See **E3/2419** *Prisoner of the Khmer Rouge*, EN 00293534. See also **E3/2811** *The Khmer Rouge Gulag*, EN 00394583.

⁴² See, for example, **E3/2811** *The Khmer Rouge Gulag*, EN 00394583, 00394609, FR 00796261, 00796287; **E3/8299** *Trankak District in the grip of the Khmer Rouge*, by Henri Locard, December 1996.

⁴³ See, for example, **E3/2811** *The Khmer Rouge Gulag*, EN 00394583, 00394585, 00394592, 00394606-00394612 and footnotes; FR 00796261, 00796263, 00796269, 00796283-00796291, 00796292-00796294; **E3/2812** *Pol Pot’s Little Red Book*, EN 00394660, 00394940-00394956, FR 00395001-00395002 and footnotes.

⁴⁴ **E294/1** Decision on Nuon Chea Request to admit new documents, to initiate an investigation and to summons Mr. Rob Lemkin, 24 July 2013, para. 24.

⁴⁵ *Ibid.*

⁴⁶ **E415/1** Request, para. 15.

⁴⁷ **E294/1** Decision on Nuon Chea Request to admit new documents, to initiate an investigation and to summons Mr. Rob Lemkin, 24 July 2013, para. 19.


them to review disclosure provided by the OCP are indicative of the substantial delay this exercise could cause.

V. RELIEF REQUESTED

24. For the reasons stated above, the Co-Prosecutors:

- (a) consider Nuon Chea's request to admit Locard's curriculum vitae (**E415.1**) moot;
- (b) do not object to the admission of the *Cambodia Daily* article entitled "In Questioning of Becker, Nuon Chea's False History Prevails" dated 17 February 2015 into evidence pursuant to Rule 87(4);
- (c) do not object to Nuon Chea's request under Rule 93 to obtain a copy of Henri Locard's doctoral thesis entitled 'Aspects of extermination and ideology under Democratic Kampuchea (17th April 1975 – 7th January 1979)';
- (d) have no objection to Locard being requested to provide the names of the witnesses he interviewed and relied on in his writings, where Locard is willing to do so, and where no confidentiality promised by Locard to his sources will be compromised; and
- (e) request the Trial Chamber to reject Nuon Chea's requests under Rule 93 for it to order Henri Locard to provide "the notes and any other underlying research material [Locard] has used in preparation of his books" and "any other material related to his field research and the interviews he conducted".

Respectfully submitted,

Date	Name	Place	Signature
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