

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

CITIZENS FOR RESPONSIBILITY)	
AND ETHICS IN WASHINGTON,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No: 1:07-cv-01707 (HHK/JMF)
)	
EXECUTIVE OFFICE OF THE)	
PRESIDENT, et al.,)	
)	
Defendants.)	
_____)	
NATIONAL SECURITY ARCHIVE,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No: 1:07-cv-01577 (HHK/JMF)
)	
EXECUTIVE OFFICE OF THE)	
PRESIDENT, et al.,)	
)	
Defendants.)	
_____)	

DEFENDANTS’ SECOND NOTICE OF COMPLIANCE

Pursuant to the Magistrate Judge’s Order [104] of January 15, 2009, requiring defendants to “forthwith deliver to the Archivist an inventory of all backup tapes . . . they have collected or will collect pursuant to this Order and that inventory shall identify with reasonable specificity and by number or other specification the contents of the tape or media[.]” and to “file this inventory with this Court,” defendants hereby submit an inventory of the approximately 70,000

disaster recovery back up tapes that were transferred to the Archivist on January 20, 2009,¹ as well as the approximately 26,000 copies of disaster recovery back-up tapes created for potential restoration projects, also transferred to the Archivist.

Attached is an electronic CD containing 16 documents. The document entitled “Tape Master Inventory” in the folder entitled “Original Tapes” on the attached CD identifies each of the eleven categories of disaster recovery back-up tapes transferred to the Archivist from the library of approximately 70,000 tapes. Fourteen additional documents on the CD provide an inventory for each category of tape, identifying, for example, the barcode number and box number associated with each of the types of tapes among the 70,000 tapes in the library. Certain columns containing sensitive server information have been omitted from the inventories.

Tape Category	Inventory Document Title(s)
Networker/Legato	Legato Tapes
EDM	EDM
VMS/ARMS	VMS 1 VMS 2
Standalone	Standalone
Geneva	Geneva 1 Geneva 2
Copy Tapes	Copy Tapes
Sequester Set 1	Sequester 1
Sequester Set 2	Sequester 2
Sequester Set 3	Sequester 3
Innovative	Innovative 1 Innovative 2
Damaged Tapes	Damaged Tapes

¹ Consistent with the Court’s Order [104], however, all of the disaster recovery back up tapes remain in the same secure facility they were in when under OA’s control.

The sixteenth document, entitled "Copy Tape Inventory" on the CD, provides information about the approximately 26,000 tapes copied by the vendor for potential use in the email restoration process that have been transferred to the Archivist.

The Office of Administration ("OA") also transferred a 6 terabyte database containing a list of every file contained on each one of the copied 26,000 disaster recovery back up tapes. NARA has been provided that database, although OA cannot provide a copy to the Court because of the size of the database and the sensitive information that could be disclosed in many of the file names. OA also provided a set of large "media databases" containing additional inventory information about the approximately 70,000 disaster recovery back-up tapes, which are not being provided to the Court with this filing due to their size and complexity. The inventories provided to this Court here, however, should satisfy defendants' obligations under the Court's Order [104] to file an inventory of the disaster recovery back up tapes with the Court.

Respectfully submitted this 22nd day of January, 2009.

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/s/ Helen H. Hong

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CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2009, a true and correct copy of the foregoing Defendants' Second Notice of Compliance was served electronically by the U.S. District Court for the District of Columbia Electronic Document Filing System (ECF) and that the document is available on the ECF system.

A copy was sent by First Class Mail, including Exhibit 1, to

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A copy of the exhibit for filing will be hand-delivered to the Court.

/s/ Helen H. Hong
HELEN H. HONG