



U.S. Department of Homeland Security  
UNITED STATES SECRET SERVICE

Washington, D.C. 20223

February 29, 2016

**VIA EMAIL**

Tom Gagliardo

Re: [REDACTED] v. Johnson, EEOC No. [REDACTED]

Dear Mr. Gagliardo:

Reference is made to Complaint's Notice of Depositions, dated February 23, 2016.

In accordance with the Case Management Order issued in this case on February 1, 2016, the Secret Service objects to the deposition of Stephen Tignor because it is not reasonably calculated to lead to the discovery of admissible evidence in this matter.

Mr. Tignor was not involved in any aspect of the decision to not employ the Complainant, and he does not have any personal knowledge of the Agency's reasons for this decision or any other subject matter relevant to the Accepted Issues in this Complaint.

Accordingly, the Agency will not be making Mr. Tignor available for deposition in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven Giballa", is written over the typed name.

Steven Giballa  
Attorney Advisor