

From: [REDACTED] (USANYS)" <[REDACTED]>
To: [REDACTED] (NY) (FBI)" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>
Cc: "Maxwell, Rita (USANYS)" <Rita.Maxwell@usdoj.gov>
Subject: [EXTERNAL EMAIL] - RE: [EXTERNAL] Propose Protocols
Date: Sun, 10 Aug 2025 22:11:28 +0000
Importance: Normal

That works for me. I'll try to get a draft of a protective order done tonight so we have something to discuss tomorrow that is more appropriate than the draft defense counsel sent us.

[REDACTED]
Assistant United States Attorney
United States Attorney's Office
Southern District of New York
[REDACTED]

From: [REDACTED]
Sent: Sunday, August 10, 2025 6:10 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]> [REDACTED] (USANYS) <[REDACTED]>
Subject: Re: [EXTERNAL] Propose Protocols

Ok. Tomorrow I should be good 10am or later.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Sunday, August 10, 2025 6:06 PM
To: [REDACTED] (NY) (FBI) <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>; Grosbard, Remy (USANYS) <[REDACTED]>
Subject: [EXTERNAL EMAIL] - RE: [EXTERNAL] Propose Protocols

Thanks. Tonight is very tough for me, but [REDACTED] may be working. I am around tomorrow morning.

From: Thomas Thompson <[REDACTED]>
Sent: Sunday, August 10, 2025 6:03 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: Re: [EXTERNAL] Propose Protocols

Ok. I'm available to talk tonight or tomorrow.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Sunday, August 10, 2025 5:40:44 PM
To: [REDACTED] (NY) (FBI) <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: [EXTERNAL EMAIL] - FW: [EXTERNAL] Propose Protocols

See attached. Putting aside the references to the Philadelphia RCFL, let's discuss at your convenience (over the phone – not email). Thanks, as always, for your help.

From: Law Office Of Robert Herz [REDACTED]
Sent: Sunday, August 10, 2025 3:32 PM
To: [REDACTED] (USANYS) <[REDACTED]>, [REDACTED] (USANYS)
[REDACTED] (USANYS) [REDACTED]
Cc: [REDACTED]; 'Samuel M. Braverman' [REDACTED]; 'Jeff M. [REDACTED]
Subject: [EXTERNAL] Propose Protocols

Here is a copy of a Word document with proposed protocols. Mr. Fischbach was in transit to New York yesterday, and we needed some time today for his latest review. Please red-line any of your proposed changes and please use tracking.

Jeff will be ready first thing in the morning to access the FBI workstation to secure our defense work product and data. At that point he will be ready to begin work at the Philadelphia RCFL. To allow for expeditious scheduling please inform the RCFL Director that he or his staff is authorized to speak with Mr. Fischbach directly to schedule time in the defense exam room.

Thank you.

Robert M. Herz
Law Offices of Robert Herz, P.C.

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