

From: Aida Leisenring <[REDACTED]>
To: Michael Bachrach <m[REDACTED]>, [REDACTED]
Cc: Bruce Barket <b[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, john diaz <[REDACTED]>, "[REDACTED]" <[REDACTED]>
Subject: RE: US v. Tartaglione
Date: Fri, 08 Jan 2021 21:39:24 +0000

Hello Jason and Maurene,

We second the request for a copy from the Civil Division of the U.S. Attorney's Office to provide defense counsel in this case with the MCC legal visit logs that you now have in your possession. In the interest of making a complete record of this death-authorized case, we are also requesting a copy from the Civil Division of the U.S. Attorney's Office of the Inmate Count logs you also indicated that you have in your possession.

Thank you and have a good weekend.

Best,

Aida Ferrer Leisenring, Esq.
Barket, Epstein, Kearon, Aldea & LoTurco LLP
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Please note that my emailed has changed to:

[REDACTED]

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From: Michael Bachrach <[REDACTED]>
Sent: Friday, January 8, 2021 10:20 AM
To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: Bruce Barket <bbarket@barketepstein.com>; Aida Leisenring <[REDACTED]>; [REDACTED]; john diaz <[REDACTED]>; [REDACTED]
Subject: Re: US v. Tartaglione

Jason and Maurene,

Following up on our conference call from yesterday, please ask the Civil Division of the U.S. Attorney's Office or firewall counsel assigned to this case (Margery Feinzig and Ilan Graff) to provide defense counsel in this case with the MCC attorney/legal visitation logs that you now have in your possession, specifically the attorney/legal visitation logs relating to visits of Nicholas Tartaglione (#78514-054).

We appreciate your agreement not to review these records for substance and to handle them through firewall or other similar counsel.

Also, just to clarify, in preparation for your Office's response to the NY Times FOIA request, did you obtain additional BOP records (besides Tartaglione's visitation logs) that relate to the penalty phase of our case, which we haven't previously reviewed or received? If so, please provide that additional information to us as well.

Thank you for your assistance.

--Michael

=====
Michael K. Bachrach, Esq.

[Redacted]

[Redacted] AM EST, [Redacted] <[Redacted]> wrote:

Yes, that works for us. Let's use this dial-in:

844-215-6902

605267

From: Michael Bachrach <[Redacted]>
Sent: Tuesday, January 5, 2021 9:36 AM
To: [Redacted]; [Redacted]; [Redacted]; Bruce Barket <[Redacted]>; Aida Leisenring <[Redacted]>; john diaz <[Redacted]>
Cc: [Redacted]
Subject: Re: US v. Tartaglione

Hi Jason,

Happy New Year to you as well.

How's Thursday at 1:30 pm for the call? Both retained and appointed counsel are available at that date and time.

--Michael

[Sent from Yahoo Mail on Android](#)

On Mon, Jan 4, 2021 at 12:24 PM, [REDACTED]

<[REDACTED]>

All,

Happy New Year and hope everyone is staying healthy. We would like to discuss an issue with you related to the Protective Order previously entered in this case regarding BOP documents (Dkt No. 119). Would you please huddle up and let us know some dates/times this week where at least one member of the retained team and one member of learned counsel are available for a call.

Thanks,

[REDACTED]

Deputy Chief, White Plains Division

United States Attorney's Office

Southern District of New York

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]