

[REDACTED]

**Subject:** Re: Responses to Supplemental Requests for Admissions and Supplemental Request for Production

**Date:** Fri, 04 Nov 2016 17:38:41 +0000

**Importance:** Normal

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Ok. Thank you [REDACTED]. The extension is fine.

Sent from my iPhone

On Nov 4, 2016, at 1:35 PM, [REDACTED]

Brad,

The government's response to the discovery requests will not be a blanket list of objections. We should be able to provide substantive responses to some of the discovery requests. However, we continue to believe that some of the requests are overbroad in what they appear to seek. As we progress in our inquiries, we will let you know the specific bases for our objections. Thanks.

[REDACTED]

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**From:** Brad Edwards [<mailto:brad@pathtojustice.com>]

**Sent:** Friday, November 04, 2016 11:37 AM

**Cc:** [cassellp@law.utah.edu](mailto:cassellp@law.utah.edu); [REDACTED]

**Subject:** Re: Responses to Supplemental Requests for Admissions and Supplemental Request for Production

Before we can answer that request, can you preliminarily just confirm that we will be getting substantive responses as opposed to just objections? Meaning, even if the true response is "none" which I don't believe it is - that would suffice and we would absolutely agree to an extension for you to complete your thorough review even if it is to ultimately produce nothing if in fact there is nothing. If, however, we are agreeing to an extension so that we can receive a longer list of objections for why responsive documents are being withheld then I would be less inclined to agree to the request.

I think you can understand our position - if we are getting responses and not mere objections then absolutely we agree to the requested extension.

Brad

Sent from my iPhone

On Nov 4, 2016, at 11:25 AM, [REDACTED]

Brad and Paul,

