

From: Paul Cassell [REDACTED]

To: [REDACTED]

Cc: "Brad Edwards" [REDACTED]
[REDACTED]

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

Date: Fri, 04 Nov 2016 15:37:07 +0000

Importance: Normal

We have no problem with giving the government whatever reasonable extra time it needs. We understand the complications that may be involved.

Paul Cassell for [REDACTED]

Paul Cassell - sent from my iPhone - please excuse brevity and errors.

On Nov 4, 2016, at 9:25 AM, [REDACTED] wrote:

Brad and Paul,

[REDACTED] and I have made progress in preparing our responses to the petitioners' Supplemental Request for Production and Supplemental Request for Admissions. We have contacted individuals who may have knowledge about the subjects encompassed in the request for admissions. Since some of the requests pertain to information possibly received by individuals within large organizations, such as the United States Attorney's Office, or "other components of the Department of Justice," or "the FBI," more time has been required to determine the appropriate response to the request for admission.

Similarly, the supplemental request for production seeks "emails or other documents" in nearly each request, from email systems maintained by other agencies within the DOJ, such as the FBI. I have inquired of the FBI whether emails from the period can be indexed and retrieved. My contact at the FBI Miami field office forwarded the request to the FBI information technology office several weeks ago. I will be speaking with the FBI Information Technology official on Monday, November 7, 2016, to see what emails can be retrieved from the 2006 – 2008 time period.

May the government have an additional thirty (30) days to respond to the supplemental request for production and supplemental request for admissions? Thanks.

[REDACTED]