

From: [REDACTED]

To: Brad Edwards [REDACTED]

Cc: [REDACTED]

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

Date: Fri, 04 Nov 2016 17:35:28 +0000

Importance: Normal

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]

From: Brad Edwards [REDACTED]

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

To: [REDACTED]

Cc: [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] wrote:

Brad and Paul,

Marie, Ed, 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.

Dexter
(305) 961-9320