

Group Ex. M



Kelly Olivier <kolivier@halemonico.com>

FW: [EXTERNAL] FW: Correspondence In re Watts Coordinated Pretrial Proceedings, 19 C 1717

web@halemonico.com <web@halemonico.com>

Sun, Feb 11, 2024 at 10:02 AM

To: Kelly Olivier <kolivier@halemonico.com>

From: web@halemonico.com <web@halemonico.com>

Sent: Friday, January 26, 2024 12:11 PM

To: 'Lorenzen, Donald' <Donald.Lorenzen@usdoj.gov>

Cc: 'Daniel M. Noland' <dnoland@reiterburns.com>; tburns@reiterburns.com

Subject: RE: [EXTERNAL] FW: Correspondence In re Watts Coordinated Pretrial Proceedings, 19 C 1717

Hi Don – the November 15, 2023 correspondence sets forth our position and we intend to ask all agents deposed about allegations of investigatory misconduct and/or their knowledge of same. We are fine with your request for 14 days in the briefing schedule and will let the court know as well.

Thanks

WEB

From: Lorenzen, Donald <Donald.Lorenzen@usdoj.gov>

Sent: Thursday, January 25, 2024 2:47 PM

To: web@halemonico.com

Cc: 'Daniel M. Noland' <dnoland@reiterburns.com>; tburns@reiterburns.com

Subject: RE: [EXTERNAL] FW: Correspondence In re Watts Coordinated Pretrial Proceedings, 19 C 1717

Bill, Dan and Terry,

I hope you are all well.

I do think that we are still at issue, and with one qualification, I don't think further discussions will be fruitful. With that in mind, for scheduling purposes, I'd like 14 days after you file your motion and brief to file our response.

That said, I do have a question about your email below. My understanding is that the only "allegations of investigatory misconduct" at issue are those you have referenced in the deposition of Shannon Spalding against special agent Patrick Smith. In your email below you refer to "allegations of investigatory misconduct by FBI agent(s)." Are there are other allegations, or other FBI agents at issue? If so, we should discuss those allegations before we start briefing.

Thanks,

Don

Donald R. Lorenzen

Senior Litigation Counsel

Consumer Protection Branch

Department of Justice

Special Assistant United States Attorney

United States Attorney's Office

Northern District of Illinois

(312) 353-5330

From: web@halemonico.com <web@halemonico.com>

Sent: Thursday, January 25, 2024 1:06 PM

To: Lorenzen, Donald <Donald.Lorenzen@usdoj.gov>

Cc: 'Daniel M. Noland' <dnoland@reiterburns.com>; tburns@reiterburns.com

Subject: RE: [EXTERNAL] FW: Correspondence In re Watts Coordinated Pretrial Proceedings, 19 C 1717

Hi Don – to follow up on conversation you had with myself and Dan, Defendants do not agree to the FBI's suggestion that we file MILs at this time on the topic of allegations of investigatory misconduct by FBI agent(s). Kindly let us know FBI final position and if we are at issue. We are happy to speak with you this afternoon but If we remain at issue we just need to supply a briefing schedule to Judge Finnegan tomorrow as referenced in attached order.

Thanks

WEB

From: Lorenzen, Donald <Donald.Lorenzen@usdoj.gov>

Sent: Tuesday, January 9, 2024 5:52 PM

To: web@halemonico.com

Cc: 'Daniel M. Noland' <dnoland@reiterburns.com>; tburns@reiterburns.com

Subject: RE: [EXTERNAL] FW: Correspondence In re Watts Coordinated Pretrial Proceedings, 19 C 1717

It does, Bill. Would you mind calling me? 312-353-5330

Donald R. Lorenzen

Senior Litigation Counsel

Consumer Protection Branch

Department of Justice

Special Assistant United States Attorney

United States Attorney's Office

Northern District of Illinois

(312) 353-5330

From: web@halemonico.com <web@halemonico.com>

Sent: Tuesday, January 9, 2024 5:26 PM

To: Lorenzen, Donald <Donald.Lorenzen@usdoj.gov>

Cc: 'Daniel M. Noland' <dnoland@reiterburns.com>; tburns@reiterburns.com

Subject: RE: [EXTERNAL] FW: Correspondence In re Watts Coordinated Pretrial Proceedings, 19 C 1717

Hi Don – does 6PM work ?

From: Lorenzen, Donald <Donald.Lorenzen@usdoj.gov>

Sent: Tuesday, January 9, 2024 4:50 PM

To: web@halemonico.com

Cc: Daniel M. Noland <dnoland@reiterburns.com>; tburns@reiterburns.com

Subject: RE: [EXTERNAL] FW: Correspondence In re Watts Coordinated Pretrial Proceedings, 19 C 1717

Sorry for not replying earlier, but I am still available today for a couple of hours (I know it's late in the day), or we can talk tomorrow. I will be at the status hearing tomorrow at 11 a.m.

Don

Donald R. Lorenzen

Senior Litigation Counsel

Consumer Protection Branch

Department of Justice

Special Assistant United States Attorney

United States Attorney's Office

Northern District of Illinois

From: web@halemonico.com <web@halemonico.com>
Sent: Monday, January 8, 2024 12:15 PM

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

From: web@halemonico.com <web@halemonico.com>
Sent: Thursday, December 7, 2023 9:31 AM
To: Lorenzen, Donald <Donald.Lorenzen@usdoj.gov>
Cc: 'Anthony Zecchin' <azecchin@halemonico.com>; 'Daniel M. Noland' <dnoland@reiterburns.com>; 'Terrence M. Burns' <tburns@reiterburns.com>; 'Mirzeta Causevic' <mcausevic@halemonico.com>
Subject: [EXTERNAL] FW: Correspondence In re Watts Coordinated Pretrial Proceedings, 19 C 1717

Hi Don – following up on attached. The attached correspondence also came up at the last court hearing before Judge Finnegan. I will also be sending you a deposition subpoena for FBI agent Mike Ponicki. Please let me know if you are authorized to accept service on his behalf or if I should effect service in a different manner.

Thanks

WEB

From: Mirzeta Causevic <mcausevic@halemonico.com>
Sent: Wednesday, November 15, 2023 6:01 PM
To: Lorenzen, Donald (USAILN) <Donald.Lorenzen@usdoj.gov>
Cc: William Bazarek <web@halemonico.com>; Daniel M. Noland <dnoland@reiterburns.com>; Terrence M. Burns <tburns@reiterburns.com>
Subject: Correspondence In re Watts Coordinated Pretrial Proceedings, 19 C 1717

Good evening Mr. Lorenzen,

Please see attached correspondence letter.

Thank you.

<image001.jpg>

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