



FW: Watts cases/Echeverria deposition

From: Tom Devine <TomD@whistleblower.org>
Sent: Monday, December 9, 2024 1:40 PM
To: web@halemonico.com
Cc: 'Kelly Olivier' <kolivier@halemonico.com>; 'Tim Scahill' <tscahill@borkanscahill.com>; 'Terrence M. Burns' <tburns@burnsnoland.com>; 'Daniel M. Noland' <doland@burnsnoland.com>; 'Brian P. Gainer' <gainerb@jbltd.com>; 'Eric Palles' <epalles@mohangroble.com>; 'Thomas Leinenweber' <thomas@ilesq.com>; 'jim Daffada' <jim@ilesq.com>
Subject: RE: Watts cases/Echeverria deposition

Web, I'm glad to continue the deposition, but my client is pretty fed up and he has given the number of hours required by the rules. I don't think he'll be persuaded by the argument that multiple lawyers couldn't cover the same issues and ask analogous questions. There's a chance I can convince him if there's something that hasn't been covered. Otherwise, we'll just have to leave it to the judge.

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From: web@halemonico.com <web@halemonico.com>
Sent: Monday, December 9, 2024 2:35 PM
To: Tom Devine <TomD@whistleblower.org>
Cc: 'Kelly Olivier' <kolivier@halemonico.com>; 'Tim Scahill' <tscahill@borkanscahill.com>; 'Terrence M. Burns' <tburns@burnsnoland.com>; 'Daniel M. Noland' <doland@burnsnoland.com>; 'Brian P. Gainer' <gainerb@jbltd.com>; 'Eric Palles' <epalles@mohangroble.com>; 'Thomas Leinenweber' <thomas@ilesq.com>; 'jim Daffada' <jim@ilesq.com>
Subject: RE: Watts cases/Echeverria deposition

Tom – as you know, multiple defense counsel were never allowed the opportunity to cover the potential topics because the deposition was terminated by you and defense counsel was not allowed a full day of deposition time.

From: Tom Devine <TomD@whistleblower.org>
Sent: Monday, December 9, 2024 1:29 PM
To: web@halemonico.com
Cc: 'Kelly Olivier' <kolivier@halemonico.com>; 'Tim Scahill' <tscahill@borkanscahill.com>; 'Terrence M. Burns' <tburns@burnsnoland.com>; 'Daniel M. Noland' <dnloland@burnsnoland.com>; 'Brian P. Gainer' <gainerb@jbltd.com>; 'Eric Palles' <epalles@mohangroble.com>; 'Thomas Leinenweber' <thomas@ilesq.com>; 'jim Daffada' <jim@ilesq.com>
Subject: RE: Watts cases/Echeverria deposition

They were all topics covered previously. Do you have anything new?

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From: web@halemonico.com <web@halemonico.com>
Sent: Monday, December 9, 2024 2:28 PM
To: Tom Devine <TomD@whistleblower.org>
Cc: 'Kelly Olivier' <kolivier@halemonico.com>; 'Tim Scahill' <tscahill@borkanscahill.com>; 'Terrence M. Burns' <tburns@burnsnoland.com>; 'Daniel M. Noland' <dnloland@burnsnoland.com>; 'Brian P. Gainer' <gainerb@jbltd.com>; 'Eric Palles' <epalles@mohangroble.com>; 'Thomas Leinenweber' <thomas@ilesq.com>; 'jim Daffada' <jim@ilesq.com>
Subject: RE: Watts cases/Echeverria deposition

Thanks Tom – you were provided potential topics on November 27, 2024.

From: Tom Devine <TomD@whistleblower.org>
Sent: Monday, December 9, 2024 11:59 AM
To: web@halemonico.com
Cc: 'Kelly Olivier' <kolivier@halemonico.com>; 'Tim Scahill' <tscahill@borkanscahill.com>; 'Terrence M. Burns' <tburns@burnsnoland.com>; 'Daniel M. Noland' <dnloland@burnsnoland.com>; 'Brian P. Gainer' <gainerb@jbltd.com>; 'Eric Palles' <epalles@mohangroble.com>; 'Thomas Leinenweber' <thomas@ilesq.com>; 'jim Daffada' <jim@ilesq.com>
Subject: RE: Watts cases/Echeverria deposition

Not confident but I'll ask, Web. Identifying any new topics not previously covered may help me convince my client.

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

Sent: Sunday, December 8, 2024 2:40 PM

To: Tom Devine <TomD@whistleblower.org>

Cc: 'Kelly Olivier' <kolivier@halemonico.com>; 'Tim Scahill' <tscahill@borkanscahill.com>; 'Terrence M. Burns' <tburns@burnsnoland.com>; 'Daniel M. Noland' <dnloland@burnsnoland.com>; 'Brian P. Gainer' <gainerb@jbltd.com>; 'Eric Palles' <epalles@mohangroble.com>; 'Thomas Leinenweber' <thomas@ilesq.com>; 'jim Daffada' <jim@ilesq.com>

Subject: RE: Watts cases/Echeverria deposition

Good afternoon Tom – in an effort to resolve the dispute over the duration of you client's deposition, would Mr. Echeverria be agreeable to an additional four (4) hours and forty (40) minutes of deposition time on the record ? Let me know.

Thanks

WEB

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

Sent: Tuesday, December 3, 2024 4:38 PM

To: 'Tom Devine' <TomD@whistleblower.org>

Cc: 'Kelly Olivier' <kolivier@halemonico.com>; 'Tim Scahill' <tscahill@borkanscahill.com>; 'Terrence M. Burns' <tburns@burnsnoland.com>; 'Daniel M. Noland' <dnloland@burnsnoland.com>; 'Brian P. Gainer' <gainerb@jbltd.com>; 'Eric Palles' <epalles@mohangroble.com>; 'Thomas Leinenweber' <thomas@ilesq.com>

Subject: RE: Watts cases/Echeverria deposition

Hi Tom - I disagree with your assessment but I appreciate you taking the time to confer.

From: Tom Devine <TomD@whistleblower.org>

Sent: Tuesday, December 3, 2024 12:53 PM

To: web@halemonico.com

Cc: 'Kelly Olivier' <kolivier@halemonico.com>; 'Tim Scahill' <tscahill@borkanscahill.com>; 'Terrence M. Burns' <tburns@burnsnoland.com>; 'Daniel M. Noland' <dnloland@burnsnoland.com>; 'Brian P. Gainer' <gainerb@jbltd.com>;

'Eric Palles' <epalles@mohangroble.com>; 'Thomas Leinenweber' <thomas@ilesq.com>
Subject: RE: Watts cases/Echeverria deposition

Hi,

Nothing that you listed in the prior email was new, so we are at issue.

Regards, Tom

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From: web@halemonico.com <web@halemonico.com>
Sent: Tuesday, December 3, 2024 1:50 PM
To: Tom Devine <TomD@whistleblower.org>
Cc: 'Kelly Olivier' <kolivier@halemonico.com>; 'Tim Scahill' <tscahill@borkanscahill.com>; 'Terrence M. Burns' <tburns@burnsnoland.com>; 'Daniel M. Noland' <dnloland@burnsnoland.com>; 'Brian P. Gainer' <gainerb@jbltd.com>; 'Eric Palles' <epalles@mohangroble.com>; 'Thomas Leinenweber' <thomas@ilesq.com>
Subject: RE: Watts cases/Echeverria deposition

Hi Tom – there are multiple parties that have not had the opportunity to depose your client and I have not completed my questions. I provided you with potential topics last week. Let me know this afternoon if you want to confer further or if we are at issue.

Thanks

WEB

From: Tom Devine <TomD@whistleblower.org>
Sent: Tuesday, December 3, 2024 12:37 PM
To: web@halemonico.com
Cc: 'Kelly Olivier' <kolivier@halemonico.com>; 'Tim Scahill' <tscahill@borkanscahill.com>; 'Terrence M. Burns' <tburns@burnsnoland.com>; 'Daniel M. Noland' <dnloland@burnsnoland.com>; 'Brian P. Gainer' <gainerb@jbltd.com>; 'Eric Palles' <epalles@mohangroble.com>; 'Thomas Leinenweber' <thomas@ilesq.com>
Subject: RE: Watts cases/Echeverria deposition

Hi,

I'll need a little more information before our call. I've checked with Mr. Echeverria and he said no to any more time. However, if you can share with me any issues that couldn't be covered previously, I may be able to convince him to participate. Otherwise, there is nothing to discuss as his answer was "no."

Regards, Tom

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From: web@halemonico.com <web@halemonico.com>
Sent: Tuesday, December 3, 2024 11:06 AM
To: Tom Devine <TomD@whistleblower.org>
Cc: 'Kelly Olivier' <kolivier@halemonico.com>; 'Tim Scahill' <tscahill@borkanscahill.com>; 'Terrence M. Burns' <tburns@burnsnoland.com>; 'Daniel M. Noland' <dnloland@burnsnoland.com>; 'Brian P. Gainer' <gainerb@jbltd.com>; 'Eric Palles' <epalles@mohangroble.com>; 'Thomas Leinenweber' <thomas@ilesq.com>
Subject: RE: Watts cases/Echeverria deposition

Hi Tom – if you are available please call me this morning at 773-632-9035.

Thanks

WEB

From: Tom Devine <TomD@whistleblower.org>
Sent: Monday, December 2, 2024 3:03 PM
To: web@halemonico.com
Cc: 'Kelly Olivier' <kolivier@halemonico.com>; 'Tim Scahill' <tscahill@borkanscahill.com>; 'Terrence M. Burns' <tburns@burnsnoland.com>; 'Daniel M. Noland' <dnloland@burnsnoland.com>; 'Brian P. Gainer' <gainerb@jbltd.com>; 'Eric Palles' <epalles@mohangroble.com>; 'Thomas Leinenweber' <thomas@ilesq.com>
Subject: RE: Watts cases/Echeverria deposition

I'm waiting to hear back from my client.

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From: web@halemonico.com <web@halemonico.com>
Sent: Monday, December 2, 2024 12:58 PM
To: Tom Devine <TomD@whistleblower.org>
Cc: 'Kelly Olivier' <kolivier@halemonico.com>; 'Tim Scahill' <tscahill@borkanscahill.com>; 'Terrence M. Burns' <tburns@burnsnoland.com>; 'Daniel M. Noland' <doland@burnsnoland.com>; 'Brian P. Gainer' <gainerb@jbltd.com>; 'Eric Palles' <epalles@mohangroble.com>; 'Thomas Leinenweber' <thomas@ilesq.com>
Subject: RE: Watts cases/Echeverria deposition

Good morning Tom - please let me know by the close of business today if we are in agreement to the additional six (6) hours of deposition time for Mr. Echeverria. I assume you have been in contact with Mr. Echeverria about the defense proposal and if we have an agreement I will inform the court that we are no longer at issue. I am also available to confer with you via telephone this afternoon if you want to speak with me directly on this matter. Hope you had a nice Thanksgiving.

Thanks

William E. Bazarek

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From: web@halemonico.com <web@halemonico.com>
Sent: Wednesday, November 27, 2024 4:14 PM
To: 'Tom Devine' <TomD@whistleblower.org>
Cc: 'Kelly Olivier' <kolivier@halemonico.com>; 'Tim Scahill' <tscahill@borkanscahill.com>; 'Terrence M. Burns' <tburns@burnsnoland.com>; 'Daniel M. Noland' <doland@burnsnoland.com>; 'Brian P. Gainer' <gainerb@jbltd.com>; 'Eric Palles' <epalles@mohangroble.com>; 'Thomas Leinenweber' <thomas@ilesq.com>
Subject: Watts cases/Echeverria deposition

Good afternoon Tom – given the number of counsel for the multiple defendants in the Watts cases we are prepared to ask the court for an additional ten (10) hours of deposition time on the record. That said, in the spirit of compromise and in order to avoid costly briefing and additional court time, we will agree to an additional six (6) hours of deposition time on the record if that is acceptable to Mr. Echeverria. Without limiting topics at deposition, there could be follow up to Mr. Echeverria's prior testimony, CPD rules and regulations and other procedures, interactions and communications with CPD members, FBI agents/federal officials, informants, Plaintiffs, and other third party witnesses relative to the Watts Coordinated Pretrial Proceedings. In addition, Mr. Echeverria's investigation in Operation Brass Tax along with his work and knowledge of federal law enforcement in that investigation. Please let me know if we have an agreement on the duration of the deposition.

Regards

William E. Bazarek

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From: web@halemonico.com <web@halemonico.com>
Sent: Tuesday, November 26, 2024 4:20 PM
To: 'Tom Devine' <TomD@whistleblower.org>
Cc: 'Kelly Olivier' <kolivier@halemonico.com>
Subject: RE: Activity in Case 1:19-cv-01717 In Re: Watts Coordinated Pretrial Proceedings order on sealed motion

Hi Tom – I am speaking with counsel for the other defendants and will be in touch.

From: Tom Devine <TomD@whistleblower.org>
Sent: Tuesday, November 26, 2024 2:17 PM
To: web@halemonico.com
Cc: 'Kelly Olivier' <kolivier@halemonico.com>
Subject: RE: Activity in Case 1:19-cv-01717 In Re: Watts Coordinated Pretrial Proceedings order on sealed motion

Hi Mr. Bazarek,

This note follows a call to you. Feel free to make a calendar invite between 8-10 AM DC time tomorrow. You may be able to ring me today after 3 Chicago time, but it'll be hit or miss. We also may be able to complete the first step by email. Mr. Echeverria very strongly believes he has testified fully about what he knows and is not going to voluntarily participate further. Based on answers to the following questions, I may be able to recommend/convince him otherwise. The premise is that he already has testified fully in his own case, plus eight hours in this one.

1. What topics need to be addressed that you have not already covered?
2. How much additional time do you need?

Feel free to respond however works best for you – a discussion or note.

Regards, Tom

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From: web@halemonico.com <web@halemonico.com>
Sent: Friday, November 22, 2024 3:08 PM
To: Tom Devine <TomD@whistleblower.org>
Cc: 'Kelly Olivier' <kolivier@halemonico.com>
Subject: FW: Activity in Case 1:19-cv-01717 In Re: Watts Coordinated Pretrial Proceedings order on sealed motion

Hi Tom – do you have time on Monday or early next week to confer with me about Mr. Echeverria. In addition, see below order from Judge Finnegan.

Thanks

William E. Bazarek

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From: usdc_ecf_ilnd@ilnd.uscourts.gov <usdc_ecf_ilnd@ilnd.uscourts.gov>

Sent: Monday, November 18, 2024 8:37 AM

To: ecfmail_ilnd@ilnd.uscourts.gov

Subject: Activity in Case 1:19-cv-01717 In Re: Watts Coordinated Pretrial Proceedings order on sealed motion

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United States District Court

Northern District of Illinois - CM/ECF NextGen 1.8 (rev. 1.8.1)

Notice of Electronic Filing

The following transaction was entered on 11/18/2024 at 8:36 AM CST and filed on 11/15/2024

Case Name: In Re: Watts Coordinated Pretrial Proceedings

Case Number: 1:19-cv-01717

Filer:

Document Number: 832

Docket Text:

MINUTE entry before the Honorable Sheila M. Finnegan. Magistrate Judge video status hearing held on 11/15/2024 and continued to 12/18/2024 at 11 a.m. The time for the United States to file a sealed position statement seeking any requested redactions from the public version of the transcript of the 9/6/2024 hearing and ruling on Certain Defendants' Motion to Depose FBI Agents regarding Allegations of Agent Misconduct Proffered by Plaintiffs' Disclosed Witnesses [688/689] is extended to 11/22/2024. Regarding Certain Defendants' Motion to Compel the Production of 24 Discs of Consensual Overhears [815], the motion is denied without prejudice for reasons stated on the record. By 12/6/2024, the parties are to meet and confer on the issues raised in the motion. After this, if the United States declines to produce any of the 24 disks, Certain Defendants may file a short motion to produce those disks by 12/13/2024. The Court will hear argument and rule during the 12/18/2024 hearing. Movant and the United States need not provide written submissions in advance of the hearing. If they wish to do so, the filings are due by 12/13/2024. Finally, Defendant Officers report a dispute with witness Echeverria over the remaining time to complete his deposition. Defendant Officers are given until 12/9/2024 to finish conferring with Echeverria's counsel about the dispute and to file a motion seeking a ruling. Response of Echeverria is due by 12/13/2024. The motion will be heard and a ruling provided during the 12/18/2024 hearing. Counsel for Defendant Officers are directed to provide a copy of this order to Echeverria's counsel. As for other depositions not yet

taken in the test cases, the parties report today that the joint status report [831] omitted an update on witnesses Graham and Tate, so this was provided during the hearing. The parties are to file a final joint status report with updated information on the remaining depositions in the test cases by 12/17/2024 (rather than 12/2/2024 as indicated during the hearing). While that joint status report and the other filings described in this order will occur after 12/2/2024 (the last day for filings in the Coordinated Proceedings (19-cv-1717) per Judge Valderrama's order [827]), the Court has conferred with Judge Valderrama and he concurs with these filing dates. The parties are to appear at the video hearing by accessing the following hyper link: https://us-courts.webex.com/join/sheila_finneganilnd.uscourts.gov. Parties that do not have access to a device with video capability and who intend to speak at the hearing must notify the courtroom deputy in advance and request the Court's permission to appear telephonically. Individuals may also listen via teleconference: the number is 1-650-479-3207; Access: 180 965 8027. Those not speaking during the hearing must mute themselves. Audio recording of the hearing is not permitted; violations of this prohibition may result in sanctions. Mailed notice (sxw)