

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

JANET JENKINS, et al.,

Plaintiffs,

v.

No. 2:12-cv-184-WKS

KENNETH L. MILLER, et al.,

Defendants.

**PLAINTIFFS' RESPONSE IN OPPOSITION TO
DEFENDANT TIMOTHY D. MILLER'S MOTION TO RECONSIDER COURT'S
ORDER OF AUGUST 31, 2020 (DOC. 554)**

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INTRODUCTION

On August 31, 2020, the Court ordered Defendant Timothy Miller to comply with Plaintiffs Janet Jenkins and Isabella Miller-Jenkins's first requests for production, holding that he failed timely to serve written objections and to show that the Fifth Amendment privilege against compulsory self-incrimination shields him from complying. Two days later, Plaintiffs demanded that Defendant produce the discovery he received from the United States in his criminal prosecution and all other responsive documents within his possession, custody, or control.

Instead of complying, Defendant attempts a do-over—806 days after Plaintiffs served the requests. Defendant untimely served written responses and objections, attempting to invoke the Fifth Amendment privilege, and filed a motion for reconsideration, arguing the Court erred in concluding that he forfeited the Fifth Amendment privilege objection and that he failed to show the privilege applies. He also disclosed that he negligently spoliated his criminal defense firm's file, including the criminal discovery, and preserved only a few documents. The Court should deny the motion.

STATEMENT OF THE CASE

A. Defendant Was Indicted in 2014 and Pleaded Guilty in 2016

In a deposition on December 20, 2011, Defendant admitted he facilitated Lisa Miller and Isabella's travel to Nicaragua and helped ensure Lisa could keep Isabella there undetected. *See* Timothy Miller Dep. Tr., *United States v. Kenneth L. Miller*, No. 2:11-cr-161 (D. Vt.), ECF 48-1, Ex. 4 to Pls.' Resp. in Opp'n to Def. Timothy Miller's Mot. to Dismiss, ECF 341-4.

On April 24, 2015, a grand jury in the Western District of New York returned a superseding indictment charging Defendant with conspiracy to remove Isabella from, and retain her outside of, the United States with intent to obstruct Jenkins's lawful exercise of parental rights from in or about September 2009 to the date of the indictment, and for removing and

aiding and abetting the removal of Isabella from the United States on or about September 22, 2009, with the same intent. *See* Superseding Indictment, *Timothy Miller*, No. 1:14-cr-175, ECF 41.

On November 30, 2016, Defendant agreed to cooperate and plead guilty to conspiracy, and the government moved to dismiss the remainder of the superseding indictment. *See* Plea Agreement ¶ 18, *Timothy Miller*, No. 1:14-cr-175, ECF 140, Ex. 16 to Mot. for Summ. J., ECF 439-16 [hereinafter Plea Agreement]. The government also agreed that Defendant “will not be prosecuted by the Office of the United States Attorney for the Western District of New York for any other federal criminal offenses committed in the Western District of New York in any way involving or related to international parental kidnapping, committed up to the date of th[e] agreement and about which [Defendant] provides complete and truthful information,” *id.* ¶ 25, and that “no testimony, statements or tangible objects provided by the defendant in compliance with th[e] agreement (or any information directly or indirectly derived therefrom) will be used against [Defendant] in any criminal case, except a prosecution for perjury or making false statements,” *id.* ¶ 26. That day, Defendant pleaded guilty to conspiracy. *See* Tr. of Plea 35, *Timothy Miller*, No. 1:14-cr-175, Ex. 17 to Mot. for Summ. J., ECF 439-17.

On March 23, 2017, the Court sentenced Defendant, granted the government’s motion to dismiss the kidnapping count, and imposed the judgment. *See* Minute Entry, *Timothy Miller*, No. 1:14-cr-175 (Mar. 23, 2017); *see* Judgment, *United States v. Timothy Miller*, No. 1:14-cr-175 (W.D.N.Y.), ECF 191, Ex. 18 to Mot. for Summ. J., ECF 439-18.

B. In 2018, Plaintiffs Served Defendant Their First Set of Requests for Production, but Defendant Ignored Them and Filed a Motion to Dismiss

Plaintiffs served their first set of requests for production on Defendant by mail on June 27, 2018. *See* Pls.’ First Set of Reqs. for Produc. to Def. Timothy Miller, Ex. 1 to Pls.’ Mot. to

Compel Def. Timothy Miller (“Mot. to Compel”), ECF 473-1 [hereinafter Reqs. for Produc.]. Defendant did not serve responses or objections by the July 30, 2018 deadline, *see* Fed. R. Civ. P. 6(d), 34(b)(2)(A), or move to stay discovery against him.

On October 1, 2018, three-and-a-half years after Defendant was served process, Michael Tierney appeared as attorney for Defendant, *see* Notice of Appearance, ECF 336; Aff. of Service, ECF 193, and moved to dismiss for lack of personal jurisdiction and insufficient service of process, *see* Def. Timothy D. Miller’s Mot. to Dismiss for Lack of Personal Jurisdiction & Insufficient Service of Process, ECF 337. Defendant again did not serve responses or objections to Plaintiffs’ discovery requests or move to stay discovery against him.

C. In 2019, Defendant Refused to Participate in Discovery While His Motion to Dismiss and Jenkins’s Motion for Partial Summary Judgment Were Pending

The following year, on October 29, 2019, the Court denied Defendant’s motion to dismiss. *See* Op. & Order: Def.’s Mot. to Dismiss, ECF 396. The next day, Soto asked Tierney when Plaintiffs could expect Defendant’s initial disclosures and his responses to Plaintiffs’ requests for production, which Soto attached. *See* Ex. 1: Emails Between Diego Soto & Michael Tierney *21–22 [hereinafter Soto–Tierney Emails].¹ Tierney did not respond. *See id.* at 21.

On November 8, Defendant moved for reconsideration of the Court’s order denying his motion to dismiss. *See* Def. Timothy D. Miller’s Mot. to Reconsider Court’s Order of Oct. 29, 2019 (Doc. 396), ECF 403. That day, Soto asked Tierney whether Defendant would engage in discovery pending disposition of that motion or whether he would instead seek a stay of discovery. *See* Soto–Tierney Emails *21. Soto and Tierney spoke by phone. *See* Decl. of Diego A. Soto in Supp. of Mot. to Compel ¶ 5 (Feb. 26, 2020), ECF 473-4 [hereinafter Soto Decl.

¹ Pincites preceded by an asterisk use the CM/ECF-generated page numbers.

(Feb. 26, 2020)]. Defendant agreed that Plaintiffs were entitled to discovery from him. *Id.* Tierney informed Soto that Defendant had given his criminal defense attorney documents that his attorney then produced to the government. *Id.* Tierney warned Soto that Defendant's ability to produce the criminal discovery could be complicated by his criminal defense attorney's now being a judge. *Id.* Defendant agreed to cooperate with Plaintiffs to produce the criminal discovery. *Id.* Given the already unacceptably long delay in receiving any discovery from Defendant and the potential complication Defendant raised, Soto offered as a potential alternative to seek the criminal discovery from the government, such as by FOIA request, if Defendant would sign the required authorization form. *Id.*

On November 21, Soto asked Tierney whether Defendant's criminal defense firm had the criminal discovery and when Plaintiffs could expect Defendant's initial disclosures and discovery responses. *See* Soto–Tierney Emails *20. On November 26, Tierney responded that Plaintiffs should seek the criminal discovery from the government through a FOIA request but did not answer whether Defendant's criminal defense firm had that discovery. *See id.* at *19–20.

On December 2, Soto asked for the *second* time in writing whether Defendant's criminal defense firm had the criminal discovery, explaining that would be the easiest and fastest way to obtain that discovery. *See id.* at *19. Soto also offered FOIA as a potential alternative, if the firm did not have the criminal discovery, and provided Tierney a link to the required release form for Defendant's signature. *See id.* Tierney did not respond. *See id.* at *18–19.

On December 13, Jenkins moved for partial summary judgment on her Vermont tort claim against Defendant. *See* Pl. Janet Jenkins's Mot. for Partial Summ. J. on Count One Against Defs. Philip Zodhiates, Kenneth Miller, and Timothy Miller, ECF 439 [hereinafter Mot. for Summ. J.].

On December 17, Soto asked for the *third* time in writing whether Defendant's criminal defense firm had the criminal discovery. *See* Soto–Tierney Emails *18. Tierney did not respond. *See id.* at *17–18.

D. In 2020, Defendant Withheld for Months That the Criminal Discovery Went Missing

On January 9, Soto received a phone call from Tierney but was unable to receive a voicemail due to a technical error. *See id.* at *16. Soto did not receive from Tierney any follow-up emails, text messages, faxes, or phone calls to either of Soto's phone numbers, which were in his email signature, or to his employer's main telephone line, which is among his contact information in this case. *See* Soto Decl. ¶ 2 (Oct. 1, 2020); *see generally* Soto–Tierney Emails.

On January 21, Soto asked Tierney when Plaintiffs could expect Defendant's initial disclosures, his responses to Plaintiffs' first set of requests for production, and his signed release form, and—for the *fourth* time in writing—whether Defendant's criminal defense firm had the criminal discovery. *See* Soto–Tierney Emails *17–18. Tierney did not respond. *See id.* at *17. The next day, Soto asked Tierney when he was available to confer by telephone regarding Plaintiffs' questions. *See id.*

On January 27, Soto and Tierney spoke by phone. Soto Decl. ¶ 6 (Feb. 26, 2020). Tierney informed Soto that Defendant did not believe he had an obligation to engage in discovery, including to serve initial disclosures and written responses and objections to Plaintiffs' requests for production, because his pending motion for reconsideration of his motion to dismiss challenged the Court's personal jurisdiction and because Jenkins had moved for partial summary judgment on her Vermont claim against him, suggesting she did not believe she needed discovery from him to impose liability on him. *See id.* Tierney also represented that Defendant would plead the Fifth Amendment to producing anything beyond the criminal discovery. *See id.*

On January 29, Plaintiffs made their position clear in a follow-up letter from Soto: the Court's local rules unambiguously required Defendant to participate in discovery. *See* Letter from Diego Soto to Michael Tierney (Jan. 29, 2020), Ex. 3 to Mot. to Compel, ECF 473-3 [hereinafter Soto Letter (Jan. 29, 2020)]. Neither his motion for reconsideration, *see id.* at 2–4, nor Jenkins's motion for partial summary judgment, *see id.* at 4–5, automatically stayed all discovery against him. Moreover, Defendant could not make a blanket Fifth Amendment privilege objection; he must make it in writing to specific requests. *See id.* at 4. Soto asked for the *fifth* time in writing whether Defendant's criminal defense firm had the criminal discovery. *See id.* at 6.

On February 5, Defendant offered to serve initial disclosures, and Plaintiffs stipulated that his doing so would not waive or forfeit his personal-jurisdiction defenses, which the Court had before it in his motion for reconsideration. *See* Soto–Tierney Emails *12–13.

On February 7, Tierney served Defendant's initial disclosures and responded that the parties "should wait and see what the result of the pending motions are before dealing substantively with" Plaintiffs' discovery requests. *Id.* at *11–12. That day, Soto asked for the *sixth* time in writing whether Defendant's criminal defense firm had the criminal discovery, and whether Defendant would sign the required FOIA release form. *See id.* at *11. Tierney did not respond. *See id.* at *10–11.

On February 13, Soto again asked Tierney those same questions (the *seventh* time in writing regarding the criminal discovery). *See id.* at *10–11. Tierney did not respond. *See id.* at *10.

On February 24, Soto again asked Tierney those same questions (the *eighth* time in writing regarding the criminal discovery). *See id.* Tierney reiterated Defendant's position that he

does not have to engage in discovery because of the pending motions. *See id.* at *9–10. He represented that Defendant “does not currently possess the information you seek (i.e. the criminal discovery produced in his criminal trial).” *Id.* at *9. He told Soto that Soto “would likely be more successful seeking this information directly from the federal government, either via FOIA or via a subpoena.” *Id.* For the first time, Tierney objected to the broad scope of the standard release form and indicated Defendant would be willing to sign a limited release. *See id.*

The next day, Soto reiterated Plaintiffs’ position that Defendant was obligated to engage in discovery and notified Defendant that they would move to compel. *See id.* at *8–9. Soto asked for the *ninth* time in writing whether Defendant’s “criminal defense firm possesses a copy of the criminal discovery; if it does, then those documents are within Mr. Miller’s control and he is required to produce them. Can I interpret your email to mean that Mr. Miller’s criminal defense firm does not possess a copy of the criminal discovery?” *Id.* at *8. Soto attached a limited release for Defendant’s edits or signature. *See id.* Tierney responded that he had sent the authorization to Defendant but ignored Soto’s questions regarding the criminal discovery. *See id.* at *7–8.

The next day, on February 26, Soto sent Tierney a corrected version of the release and asked for the *tenth* time in writing whether Defendant’s criminal defense firm had the criminal discovery. *See id.* at *7. That day, Plaintiffs filed a motion to compel Defendant to engage in discovery in good faith, including by promptly serving written responses and objections to Plaintiffs’ requests for production and producing responsive documents. *See Mot. to Compel*, ECF 473.

On March 2, ninety-one days after first being asked for a FOIA release, Tierney emailed Soto Defendant’s signed release, and Soto promptly submitted a FOIA request for all records produced in discovery in Defendant’s criminal cases. *See Soto Decl.* ¶ 3 (Oct. 1, 2020).

Defendant opposed the motion on March 9. *See* Def. Timothy Miller’s Opp’n to Pls.’ Mot. to Compel Def. Timothy Miller, ECF 475.

On April 16, Soto filed a lawsuit to compel the U.S. Department of Justice to respond to the FOIA request. *See generally SPLC v. DOJ*, No. 2:20-cv-59 (D. Vt.).

On April 22, the Court denied Defendant’s motion for reconsideration of his motion to dismiss. *See* Op. & Order: Def. Timothy D. Miller’s Mot. to Reconsider Court’s Order of Oct. 29, 2019, ECF 500 [hereinafter Order on Mot. to Reconsider Mot. to Dismiss].

On July 13, DOJ represented to Soto that its discovery to Defendant comprised twenty-five CDs (labeled 1–16 and 18–26) and hard-copy pages Bates stamped 000001–016912. *See* Ex. 2: Emails Between Diego Soto & Jason Turner 2 [hereinafter Soto–Turner Emails]. Of all that discovery, DOJ released in full only two CDs and in part some information from the CD labeled 22, from which DOJ redacted all names and phone numbers. *See* Ex. 3: Letter from Kevin Krebs, Assistant Dir., Freedom of Info. & Priv. Staff, Exec. Office for U.S. Att’ys, U.S. Dep’t of Justice, to Diego Soto (June 12, 2020) [hereinafter Krebs Letter (June 12, 2020)]. DOJ withheld the redacted information and the remainder of the discovery primarily because Soto had not provided signed releases from other, unidentified third parties. *See, e.g., id.* at 2.²

On August 31, the Court granted in part and denied in part Plaintiffs’ motion to compel, holding that Defendant “is obligated to comply with the requests” because he “failed to timely raise” objections “in writing, with specificity as to the grounds, within 30 days.” Op. & Order: Pls.’ Mot. to Compel Disc. from Def. Timothy Miller 8, ECF 554 [hereinafter Order on Mot. to Compel]. The Court also held that Defendant failed to successfully show any risk of self-

² DOJ also withheld certain records as grand-jury materials specifically exempted from disclosure by Rule 6(e) of the Federal Rules of Criminal Procedure. *See* 5 U.S.C. § 552(b)(3); Krebs Letter 2 (June 12, 2020); Soto–Turner Emails 2.

incrimination from producing documents in response to Plaintiffs' requests, given that he had already pleaded guilty to criminal charges arising from Isabella's kidnapping. *See id.* at 9–10.

On September 2, DOJ sent Soto a list of *seventy-two* individuals whose consent is needed to remove the redactions from the materials previously produced and to obtain the remainder of the criminal discovery from the government under FOIA, *see* Unopposed Mot. to Seal and for Protective Order, *SPLC*, No. 2:20-cv-59, ECF 13, and moved to stay the FOIA case for 90 days, so that Soto may attempt to obtain releases, *see* Unopposed Mot. to Stay, *SPLC*, No. 2:20-cv-59, ECF 13. That day, Soto sent Tierney a letter demanding that Defendant produce the criminal discovery and all other responsive documents within his possession, custody, or control, as ordered by the Court. *See* Letter from Diego Soto to Michael Tierney (Sept. 2, 2020), Ex. 1 to Def. Timothy D. Miller's Mot. to Reconsider Court's Order of August 31, 2020 (Doc. 554) ("Mot. to Reconsider Mot. to Compel"), ECF 560-1. Soto explained that Plaintiffs could not obtain the criminal discovery from the government, that it would be unduly burdensome for Plaintiffs to attempt to obtain releases from dozens of individuals, and that it would be less burdensome for Defendant to produce the criminal discovery himself.

On September 10, Tierney disclosed for the first time that Defendant's criminal defense firm had the criminal discovery and that it had been lost in the mail. *See* Ex. 4: Letter from Michael Tierney to Diego Soto 2 (Sept. 10, 2020) [hereinafter Tierney Letter (Sept. 10, 2020)]; Decl. of James Smith, Esq. in Supp. of Mot. to Reconsider Mot. to Compel (Sept. 10, 2020), ECF 560-2 [hereinafter Smith Decl. (Sept. 10, 2020)].³ Specifically, Tierney disclosed that, on December 2, the firm confirmed that it had Defendant's file, which "was quite voluminous,

³ Plaintiffs do not admit the truth or accuracy of Tierney's letter and Smith's declaration because they have no personal knowledge of the acts and events described.

including large three-ring binders and several CDs.” Smith Decl. ¶ 3 (Sept. 10, 2020). On December 17, Defendant himself picked up the file from the firm and delivered it to Defendant’s Pennsylvania attorney, James Smith. *See id.* ¶ 4; Tierney Letter 2 (Sept. 10, 2020). The firm “retained a digital copy of only a very small subset of the documents,” consisting mostly of “publicly filed documents.” Smith Decl. ¶ 6 (Sept. 10, 2020). The file contained CDs with materials used by DOJ to prosecute Defendant. *See id.* ¶ 7. On December 19, Smith packed and mailed the file to Tierney as uninsured Media Mail—the cheapest and slowest mailing option the United States Postal Service (USPS) offers. *See id.* at ¶ 5; Attach. to Smith Decl. 4 (Sept. 10, 2020), ECF 560-2; *Mail & Shipping Services*, USPS, <https://www.usps.com/ship/mail-shipping-services.htm>. Smith did not make a copy of any of the materials. *See* Smith Decl. ¶ 8 (Sept. 10, 2020). On December 30, the package was scanned in Springfield, Massachusetts with visible damage. *See* Attach. to Smith Decl. 4 (Sept. 10, 2020). On January 7, 2020, nineteen days after Smith mailed Tierney the file and fourteen days past its expected delivery date on December 24, *see* Tierney Letter 2 (Sept. 10, 2020), Tierney told Smith that he had not yet received the file, *see* Smith Decl. ¶ 9 (Sept. 10, 2020). That day, USPS opened an investigation. *See id.* ¶ 10. On January 11, the package was scanned as delivered without contents in Manchester, New Hampshire, *see* Attach. to Smith Decl. 4 (Sept. 10, 2020), where Tierney’s office is located, *see* Notice of Appearance 2, ECF 336. On April 13, USPS concluded the package is “irretrievably lost.” Attach. to Smith Decl. 4 (Sept. 10, 2020).

Later that day, Defendant served untimely—by 773 days—written responses and objections to Plaintiffs’ first set of requests for production. *See* Ex. 5: Def. Timothy Miller’s Resps. & Objs. to Reqs. for Produc. [hereinafter Objs.]. He invoked the Fifth Amendment

privilege in response to each request and represented that, of the documents that were preserved, one is privileged under the Fifth Amendment. *See, e.g., id.* at 8.

On September 25, at Soto's request, Tierney emailed Defendant's prosecutor requesting another copy of the criminal discovery. *See Soto-Tierney Emails* *3-5. On October 1, the prosecutor responded that he would send Defendant "a packet of prior discovery later today or tomorrow." *Id.* at *1.

SUMMARY OF ARGUMENT

Defendant's points to no factual or legal error justifying reconsideration of the Court's holdings that he failed to preserve his Fifth Amendment privilege objection to Plaintiffs' first requests for production and to show that the privilege in fact applies.

Defendant suggests several facts the Court overlooked or misunderstood or that are newly available. But the Court could not have overlooked his untimely serving of written objections after it held he failed to preserve the objections. The Court did not misunderstand Plaintiffs to seek only the criminal discovery. Defendant's *waiver* of the objection to producing the criminal discovery, and his purported cooperation with Plaintiffs to obtain that discovery, do not *preserve* the objection as to other discovery. And his spoliation of his file is not newly available information.

Defendant also argues the Court erred in concluding he forfeited the objection and failed to show the privilege applies. Neither argument is persuasive. The privilege against compulsory self-incrimination, like other objections and privileges, can be forfeited if not timely and properly invoked. The Court was well within its wide discretion to find forfeiture here. While Defendant's motions challenging the Court's personal jurisdiction remained pending, he could have made the objection in writing or sought a stay of discovery, without risking forfeiting those jurisdictional defenses; instead, Defendant did nothing to preserve any objections, withheld that

he spoliated nearly all responsive documents, and frustrated Plaintiffs' ability to obtain the criminal discovery.

Twice now Defendant had the chance to show that complying with Plaintiffs' requests would place him at real risk of further prosecution. But he fell short both times. He concedes the privilege does not apply to his conduct through September 2009, but he fails to show how his plea agreement does not protect him from prosecution for his subsequent conduct.

The motion for reconsideration should be denied.

ARGUMENT

Defendant does not meet the strict standard for reconsideration of the Court's order that he failed, procedurally and on the merits, to properly object to Plaintiffs' requests for production based on the Fifth Amendment privilege. "[R]econsideration will generally be denied unless the moving party can point to controlling decisions or data that the court overlooked," Order on Mot. to Reconsider Mot. to Dismiss 2 (quoting *Analytical Survs., Inc. v. Tonga Partners, L.P.*, 684 F.3d 36, 52 (2d Cir. 2012)), or "if the movant demonstrates an 'intervening change in controlling law, the availability of new evidence, or the need to correct a clear error or prevent manifest injustice.'" *id.* (quoting *Kolel Beth Yechiel Mechil of Tartikov, Inc. v. YLL Irrevocable Trust*, 729 F.3d 99, 104 (2d Cir. 2013)). "The decision whether to grant a motion for reconsideration rests within the 'sound discretion of a district court judge.'" *Id.* (quoting *Aczel v. Labonia*, 584 F.3d 52, 61 (2d Cir. 2009) (citing *McCarthy v. Manson*, 714 F.2d 234, 237 (2d Cir. 1983))).

I. Defendant Points to No Overlooked, Misunderstood, or Newly Available Facts That Might Reasonably Alter the Court's Conclusions

Defendant argues reconsideration is warranted because the Court overlooked or misunderstood 'matters ... that might reasonably be expected to alter the conclusion reached by the court.'" Mot. to Reconsider Mot. to Compel 2–3, ECF 560 (quoting *L&B Truck Srvs., Inc. v.*

Daimler Trucks N. Am., LLC, No. 1:9-cv-74, 2009 WL 10678877 (D. Vt. Dec. 23, 2009)). None of those purported matters meets the basic requirements for reconsideration.

First, the Court could not have overlooked Defendant's serving written responses and objections to Plaintiffs' first set of requests for production *after* the very order Defendant asks the Court to reconsider. *See* Mot. to Reconsider Mot. to Compel 2. Defendant cannot take a "second bite at the apple" by attempting to do what the Court found he failed to do—timely serve written objections to each discovery request. Order on Mot. to Reconsider Mot. to Dismiss 2 (quoting *Analytical Survs., Inc.*, 684 F.3d at 52).

Second, the Court did not mistakenly "assume[] that Plaintiffs were seeking only the discovery that was generated in that past criminal proceeding" when it referred to "discovery which Plaintiffs seek from a past criminal proceeding." *Id.* (quoting Order on Mot. to Compel 9–10). The Court merely meant that Plaintiffs seek evidence concerning a kidnapping for which Defendant has already been convicted. The Court knew Plaintiffs seek more than just the criminal discovery. *See* Order on Mot. to Compel 3 ("[Defendant] also represented that he would object, based on his Fifth Amendment privilege against compulsory self-incrimination, to producing anything beyond the criminal discovery." (citing Soto Decl. 2 (Feb. 26, 2020))); *id.* at 8 ("[T]he majority of Plaintiffs' discovery requests seek documents and communications related to Defendant's contact with Lisa Miller and Isabella Miller-Jenkins").

Third, Defendant's *waiver* of any potential Fifth Amendment privilege objection to producing the criminal discovery, and his purported cooperation with Plaintiffs to obtain that discovery, did not *preserve* a Fifth Amendment privilege objection to producing all other discovery in his possession, custody, or control. *See* Mot. to Reconsider Mot. to Compel 2–3. Even if that waiver and cooperation were relevant to the preservation question, the Court did not

err. It acknowledged that Defendant was not making objecting to producing the criminal discovery. *See* Order on Mot. to Compel 3–4 (citing Soto Decl. ¶ 6 (Feb. 26, 2020)).

The Court correctly understood that, after Soto asked Tierney on December 2, 2019, whether Defendant’s criminal defense firm had the criminal discovery and for Defendant’s FOIA release, Tierney did not email Soto again until January 24, 2020. *See* Soto–Tierney Emails *14–17. Even then, he emailed only to say when he could confer by phone. *See id.* at *14. True, Tierney called Soto on January 9 (thirty-eight days after Soto’s email) but could not leave a voicemail due to a technical problem, *see id.*, but Tierney did not try emailing, text messaging, faxing, or calling Soto’s other phone numbers, *see* Soto Decl. ¶ 2 (Oct. 1, 2020).

Glaringly, the Court could not have overlooked Defendant’s purported efforts to obtain the criminal discovery from his criminal defense firm, and those efforts certainly do not constitute newly available evidence, because he withheld this information from Plaintiffs and the Court until after the Court decided the motion to compel. Defendant’s counsel ignored every one of Soto’s questions about whether *Defendant’s criminal defense firm* had a copy of the criminal discovery and did not disclose information about that discovery before September 10, including when he and Soto spoke by phone on January 27. *See* Soto Decl. ¶ 4 (Oct. 1, 2020).

In sum, Defendant points to no overlooked information or clear error that would warrant reconsideration, so the motion should be denied.

II. The Court Did Not Clearly Err in Holding that Defendant Forfeited His Fifth Amendment Privilege Objection

Defendant argues the Court erred in holding he forfeited his Fifth Amendment privilege objection for two reasons: *First*, he argues he could not have responded to Plaintiffs’ discovery requests without forfeiting his defense that the Court lacks personal jurisdiction, which the Court had before it in his motion for reconsideration of his motion to dismiss. *See* Mot. to Reconsider

Mot. to Compel 4. *Second*, he argues he cannot forfeit the Fifth Amendment privilege objection merely by failing timely to assert it in writing to specific discovery requests, “absent bad faith and extraordinary prejudice to the requesting party.” *Id.* at 6–7. Both arguments fail.

A. Defendant Could Have Preserved His Fifth Amendment Privilege Objection Without Forfeiting His Personal Jurisdiction Defenses

Defendant’s own conduct belies his argument that he would have risked forfeiting his personal jurisdiction defenses by engaging in discovery while his motion for reconsideration of his motion to dismiss remained pending. Defendant acknowledged on January 27 that “Local Rule 26(a)(3) provides that ... that ‘[p]articipation in discovery as required under this rule will not be deemed a forfeiture or waiver of any Fed. R. Civ. P. 12 defenses.’” Soto Letter 2 (Jan. 29, 2020). Defendant served initial disclosures, after Plaintiffs formally stipulated that doing so would not waive or forfeit his personal jurisdiction defenses. *See* Soto–Tierney Emails *10–11.

Moreover, if Defendant would have risked forfeiting his personal jurisdiction defenses by participating in discovery pending his motions to dismiss and for reconsideration, then he should have moved to stay discovery to preserve those objections. The Local Rules clearly command that “[d]iscovery ... shall not be stayed during the pendency of a Fed. R. Civ. P. 12(b) or (c) motion” and that “[a] party may request a stay, or phased discovery, until the motion is decided.” L.R. 26(a)(3). Defendant instead ignored the plain language of that rule, *see* Order on Mot. to Compel 6–7, and Plaintiffs’ repeated demands that he participate in discovery or move for and secure a stay, *see, e.g.*, Soto–Tierney Emails *19; Soto Letter 2–3 (Jan. 29, 2020). Defendant cannot preserve objections through inaction in the face of clear options.

B. The Court Was Well Within Its Wide Discretion to Hold Defendant Forfeited His Fifth Amendment Privilege Objection

The Fifth Amendment privilege can be forfeited if not properly made. “No procedural principle is more familiar ... than that a constitutional right may be forfeited by the failure to

make timely assertion of the right before a tribunal having jurisdiction to determine it.” *Gonnella v. U.S. Sec. & Exch. Comm’n*, 954 F.3d 536, 544 (2d Cir. 2020) (quoting *Yakus v. United States*, 321 U.S. 414, 444 (1944)); accord *Chevron Corp. v. Donziger*, 325 F. Supp. 3d 371, 385–86 (S.D.N.Y. 2018) (holding party forfeited First Amendment objection to discovery requests by failing to timely object). The Fifth Amendment privilege “is not a self-executing mechanism; it can be ... lost by not asserting it in a timely fashion.” *Maness v. Meyers*, 419 U.S. 449, 466 (1975); see also *Garner v. United States*, 424 U.S. 648, 655 (1976) (“Only the witness knows whether the apparently innocent disclosure sought may incriminate him, and the burden appropriately lies with him to make a timely assertion of the privilege.”); *United States v. Certain Real Property & Premises Known as 4003-4005 5th Ave., Brooklyn, N.Y.*, 55 F.3d 78, 83 (2d Cir. 1995) (requiring “timely” and “appropriate” motion); *Davis v. Fendler*, 650 F.2d 1154, 1160 (9th Cir. 1981) (noting generally a Fifth Amendment privilege objection is forfeited if not timely made to discovery requests).

Although the Court should “not lightly ...infer[.]” forfeiture of the privilege, *In re DG Acquisition Corp.*, 151 F.3d 75, 80 (2d Cir. 1998) (quoting *Emspak v. United States*, 349 U.S. 190, 196 (1955)), the Court has “wide discretion” to find forfeiture if the objection is not timely made, *cf. id.* at 81 (holding Fifth Amendment privilege objection to document subpoena must be made when responses are due). Forfeiture may be found if the party intentionally delayed making the objection for tactical gain. See, e.g., *In re Application of Gorsoan Ltd.*, No. 17-cv-5912, 2020 WL 3172777, at 6–7 (S.D.N.Y. June 15, 2020) (finding forfeiture because party intentionally delayed asserting privilege for strategic advantage); *Day v. Boston Edison Co.*, 150 F.R.D. 16, 25 (D. Mass. 1993) (finding forfeiture of privilege objection to document requests because party’s “procedural gamesmanship” and “dilatatory tactics” resulted in “undue delay”).

The Court was well within its wide discretion to find Defendant forfeited his Fifth Amendment privilege objection because of his bad-faith conduct. Unlike the defendant in *Brock v. Gerace*, 110 F.R.D. 58, 63 (D.N.J. 1986) (cited at Mot. to Reconsider Mot. to Compel 7), who informally noticed his intention to make a Fifth Amendment privilege objection *before* his responses were due, Defendant did not give even informal notice until January 27, 2020, *see* Soto Letter 2 (Jan. 29, 2020)—579 days after Defendant was served the discovery requests, 483 days after his counsel entered an appearance, 90 days after the Court denied his motion to dismiss, and 80 days after his counsel and Plaintiffs’ counsel first spoke by phone. All the while, Defendant could have preserved, but chose not to preserve, his objections by serving them in writing or seeking and securing a stay of discovery.

But if Defendant responded to the requests, he would have had to disclose that he negligently spoliated his criminal defense firm’s file, including the criminal discovery, and preserved only some documents. So, instead, he informally invoked the Fifth Amendment privilege, withheld that he had spoliated the file, and in the face of an explicit, unambiguous local rule to the contrary, took the untenable, meritless, bad-faith position that he was automatically immune from discovery upon the filings of his motion for reconsideration of his motion to dismiss and Jenkins’s motion for partial summary judgment without the need to seek and obtain a discovery stay. *See* Order on Mot. to Compel 6–7. He ignored Plaintiffs’ repeated inquiry into whether his criminal defense firm had the criminal discovery and, if not, whether he would sign the required authorization for DOJ to release the criminal discovery to Plaintiffs.

Plaintiffs were prejudiced by Defendant’s strategic decision not to respond to their document requests. Had he immediately answered in December that his criminal defense firm did have the criminal discovery, Plaintiffs would have demanded he preserve and produce it,

through the cloud for example, and moved to compel if needed. Had he immediately disclosed the file had been lost in the mail, Plaintiffs would have demanded, as they did after learning of the spoliation, that Defendant request another copy from the prosecutor. But Defendant did neither, sending Plaintiffs on a costly, time-consuming, and ultimately fruitless hunt for the criminal discovery from the government. He asks to get off scot-free without producing even the single document he preserved. His newly revealed conduct only bolsters the Court's holding that he forfeited any Fifth Amendment privilege objection to Plaintiffs' discovery requests.

III. The Court Did Not Clearly Err in Holding that Defendant Failed to Show the Fifth Amendment Privilege Applies

Even if Defendant did not waive the privilege, the Court did not err in holding that the privilege does not apply. Defendant challenges the Court's holding that he failed to show Plaintiffs' discovery requests pose any risk of future self-incrimination because he already pleaded guilty to his involvement in Isabella's kidnapping. *See* Mot. to Reconsider Mot. to Compel 8–9. Defendant argues he pleaded guilty to an offense that ended in September 2009, but Plaintiffs seek evidence of his involvement in keeping Isabella in Nicaragua after September 2009. *See id.* at 8.

Given the terms of Defendant's plea agreement, Defendant has failed to meet his burden of establishing a real danger of self-incrimination. Defendant bears the burden of establishing the existence of a "real, not remote or speculative" "danger of self-incrimination." *Estate of Fisher v. CIR*, 905 F.2d 645, 649 (2d Cir. 1990). "[T]here can be no further incrimination," and thus "there is no basis for the assertion of the privilege," in "cases in which the sentence has been fixed and the judgment of conviction has become final." *Mitchell v. United States*, 526 U.S. 314, 326 (1999); *accord United States v. Romero*, 249 F.2d 371, 375 (2d Cir. 1957) ("It is well established that once a witness has been convicted for the transactions in question, he is no longer able to

claim the privilege of the Fifth Amendment and may be compelled to testify.”). Absolute bars on prosecution, such as statute of limitations, immunity, and double jeopardy, may dispose of claims of privilege. *Estate of Fisher*, 905 F.2d at 651 (citing *In re Folding Carton Antitrust Litig.*, 609 F.2d 867, 872 (7th Cir. 1979)).

Defendant concedes he enjoys no Fifth Amendment privilege as to his involvement in Isabella’s kidnapping through September 2009, *see* Mot. to Reconsider Mot. to Compel 8–9, but his untimely Fifth Amendment privilege objections purport to cover even that evidence, *see* Objs. 8–48. He does not explain, as is his burden, how he is still in real danger of further prosecution for his involvement in Isabella’s kidnapping after September 2009, despite the government’s agreement not to prosecute him for “any other federal criminal offenses” “in any way involving or related to international parental kidnapping, committed” through November 30, 2016. Plea Agreement ¶ 25. Defendant had two opportunities—first in his response to Plaintiffs’ motion to compel and now in his motion for reconsideration—to meet his burden of establishing the existence of a real danger of self-incrimination, but he twice failed to show how the full circumstances of his guilty plea do not spare him from a real danger of further prosecution.

The Court should deny the motion for reconsideration and reaffirm that Defendant no longer enjoys a Fifth Amendment privilege as to his involvement in Isabella’s kidnapping.⁴

CONCLUSION

Defendant Timothy Miller’s motion for reconsideration should be denied.

Respectfully submitted.

⁴ If the Court reconsiders its holding, it should at least reaffirm that, as conceded, Defendant has no Fifth Amendment privilege as to his conduct through September 2009.

October 1, 2020

/s/ Frank H. Langrock

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Email: maya.rajaratnam@splcenter.org

Counsel for Plaintiffs

Janet Jenkins and Isabella Miller-Jenkins

CERTIFICATE OF SERVICE

I hereby certify that, on this date, the foregoing document was served on the following counsel of record through the Court's CM/ECF system:

Richard Boyer
Integrity Law Firm, PLLC
Counsel for Defendant Linda M. Wall

Anthony R. Duprey
Neuse, Duprey & Putnam, PC
Counsel for Defendants Liberty Counsel, Inc. and Rena M. Lindevaldsen

Roger K. Gannam
Liberty Counsel
Counsel for Defendants Liberty Counsel, Inc. and Rena M. Lindevaldsen

Adam S. Hochschild
Hochschild Law Firm, LLC
Counsel for Defendant Linda M. Wall

Michael R. Hirsh
Hirsh & Heuser, LLC
Counsel for Defendants Philip Zodhiates, Victoria Hyden, and Response Unlimited, Inc.

Brooks G. McArthur
Jarvis, McArthur & Williams, LLC
Counsel for Defendant Kenneth L. Miller

Horatio G. Mihet
Liberty Counsel
Counsel for Defendants Liberty Counsel, Inc. and Rena M. Lindevaldsen

Daniel Joseph Schmid
Liberty Counsel
Counsel for Defendants Liberty Counsel, Inc. and Rena M. Lindevaldsen

Norman C. Smith
Norman C. Smith, PC
Counsel for Defendant Linda M. Wall

Michael J. Tierney
Wadleigh, Starr & Peters, PLLC
Counsel for Defendant Timothy D. Miller

October 1, 2020

/s/ Diego A. Soto

Diego A. Soto

Counsel for Plaintiffs

Janet Jenkins and Isabella Miller-Jenkins

Diego Soto

From: Michael J. Tierney <mtierney@wadleighlaw.com>
Sent: Thursday, October 1, 2020 10:35 AM
To: Diego Soto
Cc: Beth Littrell; Claudia Huerta; Emily Joselson; flangrock; Jessica Stone; Maya Rajaratnam; Sarah Star; Scott McCoy; Tyler Clemons
Subject: FW: Timo Miller

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Diego:

See below update received a few minutes ago.

I will let you know as soon as it is received.

Michael

Michael J. Tierney, Esq.
Wadleigh, Starr & Peters, PLLC
95 Market Street
Manchester, NH 03101
603-669-4140
603-206-7239 (Direct)
603-669-6018 (Fax)

From: Van de Graaf, Paul (USAVT) <Paul.Van.De.Graaf@usdoj.gov>
Sent: Thursday, October 1, 2020 11:32 AM
To: Michael J. Tierney <mtierney@wadleighlaw.com>
Subject: RE: Timo Miller

My assistant is sending you out a packet of prior discovery later today or tomorrow.

Paul J. Van de Graaf
Senior Litigation Counsel
United States Attorney's Office, District of Vermont
802-951-6725
802-233-4859 (cell)

From: Michael J. Tierney <mtierney@wadleighlaw.com>
Sent: Friday, September 25, 2020 9:33 AM
To: Van de Graaf, Paul (USAVT) <PVanDeGraaf@usa.doj.gov>
Subject: Timo Miller

EXHIBIT
1

Attorney Van de Graaf:

I serve as counsel to Timo Miller in a civil case currently pending US District Court for Vermont: Jenkins v. Miller, et al, 2:12-cv-184-wks. The plaintiff has requested Mr. Miller produce to them the criminal discovery provided by your office to Mr. Miller's prior criminal defense counsel, Jeff Conrad. This would have been in connection with *United States v. Timothy David Miller*, No. 2:11-mj-28 (D. Vt.), *United States v. Timothy David Miller*, No. 5:11-cr-44 (D. Vt.), and/or *United States v. Timothy Miller*, No. 1:14-cr-00175 in the Western District of New York for which I understand you served as special prosecutor. I understand that there were several CDs of materials but our attempt to retrieve the criminal discovery production from Mr. Miller's criminal defense firm has proven unsuccessful. See attached. Therefore, would you please provide to us with a copy of what was provided to Attorney (now Judge) Conrad in connection with my client's criminal case?

Thank you for your assistance.

Michael

Michael J. Tierney, Esq., VT Bar No. 5275
Wadleigh, Starr & Peters, PLLC
95 Market Street
Manchester, NH 03101
603-669-4140
603-206-7239 (Direct)
603-669-6018 (Fax)

Diego Soto

From: Michael J. Tierney <mtierney@wadleighlaw.com>
Sent: Friday, September 25, 2020 8:38 AM
To: Diego Soto
Cc: Beth Littrell; Claudia Huerta; Emily Joselson; flangrock; Jessica Stone; Maya Rajaratnam; Sarah Star; Scott McCoy; Tyler Clemons
Subject: RE: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Timothy Miller's Criminal Discovery
Attachments: Timo Miller

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Diego:

Pursuant to your request, I have today made a request to the government attorney who prosecuted Timo's case that he re-produce the criminal discovery file. I will let you know as soon as I hear anything from the government attorney.

I am attaching my request to this email.

Michael

Michael J. Tierney, Esq.
Wadleigh, Starr & Peters, PLLC
95 Market Street
Manchester, NH 03101
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603-206-7239 (Direct)
603-669-6018 (Fax)

From: Diego Soto <Diego.Soto@splcenter.org>
Sent: Wednesday, September 23, 2020 5:57 PM
To: Michael J. Tierney <mtierney@wadleighlaw.com>
Cc: Beth Littrell <beth.littrell@splcenter.org>; Claudia Huerta <claudia.huerta@splcenter.org>; Emily Joselson <ejoselson@langrock.com>; flangrock <flangrock@langrock.com>; Jessica Stone <jessica.stone@splcenter.org>; Maya Rajaratnam <maya.rajaratnam@splcenter.org>; Sarah Star <sarahstar.esq@gmail.com>; Scott McCoy <Scott.McCoy@splcenter.org>; Tyler Clemons <Tyler.Clemons@splcenter.org>
Subject: RE: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Timothy Miller's Criminal Discovery

Thanks, Michael. I am willing to raise this with the AUSA assigned to our civil FOIA case, but will Mr. Miller simultaneously request a copy of the criminal discovery from the government attorneys who prosecuted him? If he will, please let me know when that request is made.



Diego Soto *he/him/his*
Staff Attorney | LGBTQ Rights & Special Litigation
Southern Poverty Law Center
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From: Michael J. Tierney <mtierney@wadleighlaw.com>
Sent: Wednesday, September 23, 2020 4:27 PM
To: Diego Soto <Diego.Soto@splcenter.org>
Cc: Beth Littrell <beth.littrell@splcenter.org>; Claudia Huerta <claudia.huerta@splcenter.org>; Emily Joselson <ejoselson@langrock.com>; flangrock <flangrock@langrock.com>; Jessica Stone <jessica.stone@splcenter.org>; Maya Rajaratnam <maya.rajaratnam@splcenter.org>; Sarah Star <sarahstar.esq@gmail.com>; Scott McCoy <Scott.McCoy@splcenter.org>; Tyler Clemons <Tyler.Clemons@splcenter.org>
Subject: RE: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Timothy Miller's Criminal Discovery

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Diego:

As far as Mr. Miller's efforts to obtain a copy from the Department of Justice, Mr. Miller executed (in February) the authorization you had prepared so that SPLC/Jenkins could obtain the discovery.

If there are other steps that you think are necessary or helpful to obtain a copy from the Department of Justice, please advise and we will cooperate with you to obtain a copy of these documents.

Given that you have a pending FOIA case, it may make sense for you to discuss with the DOJ attorney in that case and find out from the DOJ attorney what precisely he needs from Mr. Miller to produce the discovery given to Judge Conrad many years ago.

Mr. Miller is ready and willing to cooperate with whatever documentation may be necessary to have the DOJ produce the discovery.

Michael

Michael J. Tierney, Esq.
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603-669-6018 (Fax)

From: Diego Soto <Diego.Soto@splcenter.org>
Sent: Wednesday, September 23, 2020 5:03 PM
To: Michael J. Tierney <mtierney@wadleighlaw.com>
Cc: Beth Littrell <beth.littrell@splcenter.org>; Claudia Huerta <claudia.huerta@splcenter.org>; Diego Soto <Diego.Soto@splcenter.org>; Emily Joselson <ejoselson@langrock.com>; flangrock <flangrock@langrock.com>; Jessica Stone <jessica.stone@splcenter.org>; Maya Rajaratnam <maya.rajaratnam@splcenter.org>; Sarah Star <sarahstar.esq@gmail.com>; Scott McCoy <Scott.McCoy@splcenter.org>; Tyler Clemons <Tyler.Clemons@splcenter.org>
Subject: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Timothy Miller's Criminal Discovery

Michael,

As suggested by my previous email, we are still working on our response to Mr. Miller's motion for reconsideration. In the meantime, could you let me know whether Mr. Miller has attempted to obtain another copy of the criminal discovery from the Department of Justice? If not, will Mr. Miller promptly make that attempt?

Sincerely,
Diego



Diego Soto he/him/his
Staff Attorney | LGBTQ Rights & Special Litigation
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Diego Soto

From: Diego Soto
Sent: Monday, March 2, 2020 3:16 PM
To: Michael Tierney
Cc: Brooks G. McArthur; Anthony Duprey; Daniel J. Schmid; Horatio Mihet; Roger K. Gannam; Adam Hochschild; Norman C. Smith; Richard Boyer; Toddy Ferguson; Beth Littrell; Claudia Huerta; Emily Joselson; flangrock; Jessica Stone; jswift; Julie Jackman; Maya Rajaratnam; Sarah Star; Scott McCoy; srs; Tyler Clemons
Subject: RE: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Plaintiffs' First Set of Requests for Production to Defendant Timothy Miller

Thanks, Michael. You can mail me the original at 400 Washington Avenue, Montgomery, AL 36104.



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From: Michael Tierney <mtierney@wadleighlaw.com>
Sent: Monday, March 2, 2020 2:31 PM
To: Diego Soto <Diego.Soto@splcenter.org>
Cc: Brooks G. McArthur <bmcarthur@jarvismcarthur.com>; Anthony Duprey <anthony@ndp-law.com>; Daniel J. Schmid <dschmid@lc.org>; Horatio Mihet <hmihet@lc.org>; Roger K. Gannam <rgannam@lc.org>; Adam Hochschild <adam@hochschildlaw.com>; Norman C. Smith <norman@normansmithlaw.com>; Richard Boyer <rickboyerlaw@gmail.com>; Toddy Ferguson <cs.fergie@myfairpoint.net>; Beth Littrell <beth.littrell@splcenter.org>; Claudia Huerta <claudia.huerta@splcenter.org>; Emily Joselson <ejoselson@langrock.com>; flangrock <flangrock@langrock.com>; Jessica Stone <jessica.stone@splcenter.org>; jswift <jswift@langrock.com>; Julie Jackman <jjackman@langrock.com>; Maya Rajaratnam <maya.rajaratnam@splcenter.org>; Sarah Star <sarahstar.esq@gmail.com>; Scott McCoy <Scott.McCoy@splcenter.org>; srs <srs@sarahstarlaw.com>; Tyler Clemons <Tyler.Clemons@splcenter.org>
Subject: RE: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Plaintiffs' First Set of Requests for Production to Defendant Timothy Miller

Diego:

Attached is Mr. Miller's authorization which I received in today's mail. Please advise if you would like the original sent to you in Alabama or to local counsel in Vermont or if you feel a scan is sufficient.

Michael

Michael J. Tierney, Esq.
Wadleigh, Starr & Peters, PLLC
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Manchester, NH 03101
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603-669-6018 (Fax)

From: Diego Soto <Diego.Soto@splcenter.org>

Sent: Wednesday, February 26, 2020 10:23 AM

To: Michael Tierney <mtierney@wadleighlaw.com>

Cc: Brooks G. McArthur <bmcarthur@jarvismcarthur.com>; Anthony Duprey <anthony@ndp-law.com>; Daniel J. Schmid <dschmid@lc.org>; Horatio Mihet <hmihet@lc.org>; Roger K. Gannam <rgannam@lc.org>; Adam Hochschild <adam@hochschildlaw.com>; Norman C. Smith <norman@normansmithlaw.com>; Richard Boyer <rickboyerlaw@gmail.com>; Toddy Ferguson <cs.fergie@myfairpoint.net>; Beth Littrell <beth.littrell@splcenter.org>; Claudia Huerta <claudia.huerta@splcenter.org>; Emily Joselson <ejoselson@langrock.com>; flangrock <flangrock@langrock.com>; Jessica Stone <jessica.stone@splcenter.org>; jswift <jswift@langrock.com>; Julie Jackman <jjackman@langrock.com>; Maya Rajaratnam <maya.rajaratnam@splcenter.org>; Sarah Star <sarahstar.esq@gmail.com>; Scott McCoy <Scott.McCoy@splcenter.org>; srs <srs@sarahstarlaw.com>; Tyler Clemons <Tyler.Clemons@splcenter.org>

Subject: RE: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Plaintiffs' First Set of Requests for Production to Defendant Timothy Miller

Thanks, Michael. I just realized the draft authorization I sent you on Tuesday did not include the case in which Mr. Miller pleaded guilty. Please use the attached corrected version. I apologize for this oversight. Please let me know if you won't be able to send me the signed authorization by close of business Friday. We will produce to all parties whatever we receive in response to the FOIA request.

Please also let me know whether I can interpret your email from Monday to mean that Mr. Miller's criminal defense firm does not possess a copy of the criminal discovery.

Thanks,
Diego



Diego Soto he/him/his

Staff Attorney | LGBTQ Rights & Special Litigation

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From: Michael Tierney <mtierney@wadleighlaw.com>

Sent: Tuesday, February 25, 2020 5:46 PM

To: Diego Soto <Diego.Soto@splcenter.org>

Cc: Brooks G. McArthur <bmcarthur@jarvismcarthur.com>; Anthony Duprey <anthony@ndp-law.com>; Daniel J. Schmid <dschmid@lc.org>; Horatio Mihet <hmihet@lc.org>; Roger K. Gannam <rgannam@lc.org>; Adam Hochschild <adam@hochschildlaw.com>; Norman C. Smith <norman@normansmithlaw.com>; Richard Boyer <rickboyerlaw@gmail.com>; Toddy Ferguson <cs.fergie@myfairpoint.net>; Beth Littrell <beth.littrell@splcenter.org>; Claudia Huerta <claudia.huerta@splcenter.org>; Diego Soto <Diego.Soto@splcenter.org>; Emily Joselson <ejoselson@langrock.com>; flangrock <flangrock@langrock.com>; Jessica Stone <jessica.stone@splcenter.org>; jswift <jswift@langrock.com>; Julie Jackman <jjackman@langrock.com>; Maya Rajaratnam <maya.rajaratnam@splcenter.org>; Sarah Star <sarahstar.esq@gmail.com>; Scott McCoy <Scott.McCoy@splcenter.org>; srs <srs@sarahstarlaw.com>; Tyler Clemons <Tyler.Clemons@splcenter.org>

Subject: Re: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Plaintiffs' First Set of Requests for Production to Defendant Timothy Miller

Diego:

No edits are required. I have sent the authorization to my client to sign and return. I will send it to you as soon as I have it back from my client in Pennsylvania.

May I presume you will share a copy of whatever you obtain without us needing to make a formal request?

Thanks,

Michael

From: Diego Soto <Diego.Soto@splcenter.org>

Sent: Tuesday, February 25, 2020 11:45:40 AM

To: Michael Tierney <mtierney@wadleighlaw.com>

Cc: Brooks G. McArthur <bmcarthur@jarvismcarthur.com>; Anthony Duprey <anthony@ndp-law.com>; Daniel J. Schmid <dschmid@lc.org>; Horatio Mihet <hmihet@lc.org>; Roger K. Gannam <rgannam@lc.org>; Adam Hochschild <adam@hochschildlaw.com>; Norman C. Smith <norman@normansmithlaw.com>; Richard Boyer <rickboyerlaw@gmail.com>; Toddy Ferguson <cs.fergie@myfairpoint.net>; Beth Littrell <beth.littrell@splcenter.org>; Claudia Huerta <claudia.huerta@splcenter.org>; Diego Soto <Diego.Soto@splcenter.org>; Emily Joselson <ejoselson@langrock.com>; flangrock <flangrock@langrock.com>; Jessica Stone <jessica.stone@splcenter.org>; jswift <jswift@langrock.com>; Julie Jackman <jjackman@langrock.com>; Maya Rajaratnam <maya.rajaratnam@splcenter.org>; Sarah Star <sarahstar.esq@gmail.com>; Scott McCoy <Scott.McCoy@splcenter.org>; srs <srs@sarahstarlaw.com>; Tyler Clemons <Tyler.Clemons@splcenter.org>

Subject: RE: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Plaintiffs' First Set of Requests for Production to Defendant Timothy Miller

Michael,

Thank you for your response. Since we first spoke in November, I have asked you no less than six times in writing whether Mr. Miller's criminal defense firm possesses a copy of the criminal discovery. Three-and-a-half months later, you still have not clearly answered my specific question whether Mr. Miller's criminal defense firm possesses a copy of the criminal discovery; if it does, then those documents are within Mr. Miller's control and he is required to produce them. Can I interpret your email to mean that Mr. Miller's criminal defense firm does not possess a copy of the criminal discovery?

Since November, I also have asked you no less than five times in writing whether Mr. Miller would sign the required form authorizing the Department of Justice to release the criminal discovery to Plaintiffs in response to a FOIA request. To the best of my recollection, you have raised this concern about the breadth of the required authorization form for the first time yesterday. Had you raised this earlier, instead of ignoring my clear questions until yesterday, I would have gladly worked with you to draft narrower authorization language and to confirm its sufficiency with DOJ.

This delay is of your making, not mine. I have made every effort to narrow our discovery disputes by offering to seek the bulk (I imagine) of Mr. Miller's responsive documents from the government. You have obstructed that potential avenue even while insisting on it. I hope you will now extend to me the same professionalism I have extended to you.

I have attached a proposed narrower authorization and consent. It is my understanding that the consent must be notarized or signed under penalty of perjury pursuant to 18 U.S.C. § 1001. **Please send me any proposed edits by close of business today and a signed copy from Mr. Miller by close of business Thursday.** I will let you know if DOJ deems the authorization inadequate for whatever reason. I look forward to your prompt review and approval. And for the record, although DOJ is required to determine within 20 days whether it will produce records responsive to a FOIA request, it does not typically produce all the records within 20 days, which often necessitates lawsuits.

As for discovery beyond the criminal discovery, I am more than willing to work with you to narrow and clarify Plaintiffs' requests for production, but I cannot begin to do that until Mr. Miller serves written responses and objections. It remains Plaintiffs' position that Mr. Miller has an obligation now to engage in discovery even while his and Ms. Jenkins' dispositive motions remain pending. Given Mr. Miller's steadfast refusal to meet his discovery obligations, Plaintiffs will move to compel Mr. Miller to serve written responses and objections and to engage in discovery. Plaintiffs will ask for reasonable expenses incurred in making the motion, including attorney's fees.

Sincerely,
Diego



Diego Soto he/him/his
Staff Attorney | LGBTQ Rights & Special Litigation
Southern Poverty Law Center
T 334.956.8427 C 334.604.1414 F 334.956.8481
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Admitted in Alabama and the District of Columbia

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From: Michael Tierney <mtierney@wadleighlaw.com>
Sent: Monday, February 24, 2020 4:38 PM
To: Diego Soto <Diego.Soto@splcenter.org>
Cc: Brooks G. McArthur <bmcarthur@jarvismcarthur.com>; Anthony Duprey <anthony@ndp-law.com>; Daniel J. Schmid <dschmid@lc.org>; Horatio Mihet <hmihet@lc.org>; Roger K. Gannam <rgannam@lc.org>; Adam Hochschild <adam@hochschildlaw.com>; Norman C. Smith <norman@normansmithlaw.com>; Richard Boyer <rickboyerlaw@gmail.com>; Toddy Ferguson <cs.fergie@myfairpoint.net>
Subject: RE: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Plaintiffs' First Set of Requests for Production to Defendant Timothy Miller

Diego:

Mr. Miller does not currently possess the information you seek (i.e. the criminal discovery produced in his criminal trial). As I have explained to you numerous times, you would likely be more successful seeking this information directly from the federal government, either via FOIA or via a subpoena. The fact that you have sought information regarding Kenneth Miller via a FOIA request means that you can make such a request for whatever non-privileged information you may seek regarding Timothy Miller. The government must respond to a FOIA request within 20 days. Any delays you have in making this request is entirely of your own making as I have been consistently telling you for months that you should be directing your requests to the federal government. Where you have filed a motion for summary judgment against Timothy Miller alleging you can show liability without additional discovery, it would be unduly burdensome and disproportionate to require Mr. Miller to assist in your fishing expedition where you have asserted to the court that no discovery is needed. It is important to note that the authorization you are asking Mr. Miller to sign is not limited to criminal discovery but is asking Mr. Miller to waive all privilege that may exist against the production of any and all documents (for example, such authorization would allow you to access Mr. Miller's tax or social security records that have no relevance to this case and would be privileged from discovery). Regardless, I am not aware of any case where a defendant has been required to waive his privileges and affirmatively give the plaintiff who is suing him complete and unfettered access to all federal records that any federal agency may possess on him. As I have explained on the telephone, if you would like to narrow your requests and the Court were to both deny your motion for summary judgment and my motion to reconsider the motion to dismiss, we can discuss the proper parameters of such requests. If you would like to send me a more limited authorization authorizing a FOIA request limited to the criminal prosecution of Mr. Miller and go that route, I would be happy to discuss.

Michael

Michael J. Tierney, Esq.
Wadleigh, Starr & Peters, PLLC
95 Market Street
Manchester, NH 03101
603-669-4140
603-206-7239 (Direct)
603-669-6018 (Fax)

From: Diego Soto <Diego.Soto@splcenter.org>
Sent: Monday, February 24, 2020 10:11 AM
To: Michael Tierney <mtierney@wadleighlaw.com>
Cc: Beth Littrell <beth.littrell@splcenter.org>; Claudia Huerta <claudia.huerta@splcenter.org>; Emily Joselson <ejoselson@langrock.com>; flangrock <flangrock@langrock.com>; Jessica Stone <jessica.stone@splcenter.org>; jswift <jswift@langrock.com>; Julie Jackman <jjackman@langrock.com>; Maya Rajaratnam <maya.rajaratnam@splcenter.org>; Sarah Star <sarahstar.esq@gmail.com>; Scott McCoy <Scott.McCoy@splcenter.org>; srs <srs@sarahstarlaw.com>; Tyler Clemons <Tyler.Clemons@splcenter.org>; Brooks G. McArthur <bmcarthur@jarvismcarthur.com>; Anthony Duprey <anthony@ndp-law.com>; Daniel J. Schmid <dschmid@lc.org>; Horatio Mihet <hmihet@lc.org>; Roger K. Gannam <rgannam@lc.org>; Adam Hochschild <adam@hochschildlaw.com>; Norman C. Smith <norman@normansmithlaw.com>; Richard Boyer <rickboyerlaw@gmail.com>; Toddy Ferguson <cs.fergie@myfairpoint.net>
Subject: RE: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Plaintiffs' First Set of Requests for Production to Defendant Timothy Miller

Michael,

Please let me know by close of business today (1) whether Mr. Miller's criminal defense firm has a copy of the criminal discovery and (2) whether Mr. Miller will sign the [authorization](#) for DOJ to release the criminal discovery to plaintiffs. If Mr. Miller will sign the authorization, please email me the signed authorization by close of business Wednesday. Otherwise, Plaintiffs will be forced to seek relief from the Court.

As my January 29 letter and February 7 email make clear, FOIA is not an option to obtain the criminal discovery without Mr. Miller's signed authorization. It is also a time-consuming process, and much time has been lost—since at least December 2—because of Mr. Miller's failure even to say whether he will sign the authorization form.

Sincerely,
Diego



Diego Soto he/him/his
Staff Attorney | LGBTQ Rights & Special Litigation
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T 334.956.8427 C 334.604.1414 F 334.956.8481
diego.soto@splcenter.org | www.splcenter.org
Admitted in Alabama and the District of Columbia

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From: Diego Soto
Sent: Thursday, February 13, 2020 9:42 AM
To: Michael Tierney <mtierney@wadleighlaw.com>

Cc: Beth Littrell <beth.littrell@splcenter.org>; Claudia Huerta <claudia.huerta@splcenter.org>; Emily Joselson <ejoselson@langrock.com>; flangrock <flangrock@langrock.com>; Jessica Stone <jessica.stone@splcenter.org>; jswift <jswift@langrock.com>; Julie Jackman <jjackman@langrock.com>; Maya Rajaratnam <maya.rajaratnam@splcenter.org>; Sarah Star <sarahstar.esq@gmail.com>; Scott McCoy <scott.mccoy@splcenter.org>; srs <srs@sarahstarlaw.com>; Tyler Clemons <Tyler.Clemons@splcenter.org>; Brooks G. McArthur <bmcarthur@jarvismcarthur.com>; Anthony Duprey <anthony@ndp-law.com>; Daniel J. Schmid <dschmid@lc.org>; Horatio Mihet <hmihet@lc.org>; Roger K. Gannam <rgannam@lc.org>; Adam Hochschild <adam@hochschildlaw.com>; Norman C. Smith <norman@normansmithlaw.com>; Richard Boyer <rickboyerlaw@gmail.com>; Toddy Ferguson <cs.fergie@myfairpoint.net>

Subject: RE: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Plaintiffs' First Set of Requests for Production to Defendant Timothy Miller

Michael,

Attached are Plaintiffs' initial disclosures, which were originally served on July 9, 2018. Apologies for the delay.

Do you have an update on the issues I raised in my email below?

Thanks,
Diego



Diego Soto he/him/his
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diego.soto@splcenter.org | www.splcenter.org
Admitted in Alabama and the District of Columbia

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From: Diego Soto

Sent: Friday, February 7, 2020 5:40 PM

To: Michael Tierney <mtierney@wadleighlaw.com>

Cc: Beth Littrell <beth.littrell@splcenter.org>; Claudia Huerta <claudia.huerta@splcenter.org>; Emily Joselson <ejoselson@langrock.com>; flangrock <flangrock@langrock.com>; Jessica Stone <jessica.stone@splcenter.org>; jswift <jswift@langrock.com>; Julie Jackman <jjackman@langrock.com>; Maya Rajaratnam <maya.rajaratnam@splcenter.org>; Sarah Star <sarahstar.esq@gmail.com>; Scott McCoy <Scott.McCoy@splcenter.org>; srs <srs@sarahstarlaw.com>; Tyler Clemons <Tyler.Clemons@splcenter.org>; Brooks G. McArthur <bmcarthur@jarvismcarthur.com>; Anthony Duprey <anthony@ndp-law.com>; Daniel J. Schmid <dschmid@lc.org>; Horatio Mihet <hmihet@lc.org>; Roger K. Gannam <rgannam@lc.org>; Adam Hochschild <adam@hochschildlaw.com>; Norman C. Smith <norman@normansmithlaw.com>; Richard Boyer <rickboyerlaw@gmail.com>; Toddy Ferguson <cs.fergie@myfairpoint.net>

Subject: Re: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Plaintiffs' First Set of Requests for Production to Defendant Timothy Miller

Thanks, Michael. Are you able to confirm whether Mr. Miller's criminal defense firm has a copy of the criminal discovery and whether Mr. Miller would sign the authorization described in my letter? FOIA isn't an option without that authorization and is becoming less of a realistic option as time progresses.

I'll forward you Plaintiffs' initial disclosures shortly.

On Feb 7, 2020, at 5:25 PM, Michael Tierney <mtierney@wadleighlaw.com> wrote:

Diego:

Pursuant to your request, attached are a copy of Timothy Miller's Initial Disclosures.

You have my assent to have an extra week on getting a reply to the motion for summary judgment filed.

As far as other discovery requests, we should wait and see what the result of the pending motions are before dealing substantively with those. As you recognize in your letter, the discovery requests are overly burdensome and could be substantially narrowed. Most of what you are looking for could be more easily obtained via a FOIA request or another avenue and you are once again encouraged to pursue those other avenues.

Finally, I could not find a record in my file of having received Jenkin's initial disclosures. Would you please send those to me or let me know when they will be produced?

Thanks,

Michael

Michael J. Tierney, Esq.
Wadleigh, Starr & Peters, PLLC
95 Market Street
Manchester, NH 03101
603-669-4140
603-206-7239 (Direct)
603-669-6018 (Fax)

From: Diego Soto <Diego.Soto@splcenter.org>

Sent: Wednesday, February 5, 2020 11:08 AM

To: Michael Tierney <mtierney@wadleighlaw.com>

Cc: Beth Littrell <beth.littrell@splcenter.org>; Claudia Huerta <claudia.huerta@splcenter.org>; Emily Joselson <ejoselson@langrock.com>; flangrock <flangrock@langrock.com>; Jessica Stone <jessica.stone@splcenter.org>; jswift <jswift@langrock.com>; Julie Jackman <jjackman@langrock.com>; Maya Rajaratnam <maya.rajaratnam@splcenter.org>; Sarah Star <sarahstar.esq@gmail.com>; Scott McCoy <Scott.McCoy@splcenter.org>; srs <srs@sarahstarlaw.com>; Tyler Clemons <Tyler.Clemons@splcenter.org>; Brooks G. McArthur <bmcarthur@jarvismcarthur.com>; Anthony Duprey <anthony@ndp-law.com>; Daniel J. Schmid <dschmid@lc.org>; Horatio Mihet <hmihet@lc.org>; Roger K. Gannam <rgannam@LC.org>; Adam Hochschild <adam@hochschildlaw.com>; Norman C. Smith <norman@normansmithlaw.com>; Richard Boyer <rickboyerlaw@gmail.com>; Toddy Ferguson <cs.fergie@myfairpoint.net>

Subject: RE: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Plaintiffs' First Set of Requests for Production to Defendant Timothy Miller

Michael,

Thanks for reaching out. Would a new deadline of COB Friday be sufficient?

Plaintiffs stipulate that Mr. Miller's service of initial disclosures does not waive or forfeit the defenses he has raised, in his motion to dismiss and his motion for reconsideration, that the Court lacks personal jurisdiction and that service of process was insufficient. If that suffices, please let me know when we can expect those initial disclosures.

Please also let me know if Mr. Miller objects to a 1-week extension of the time for Ms. Jenkins to reply to his response in opposition to her motion for partial summary judgment on Count 1.

Thanks,
Diego



Diego Soto he/him/his
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diego.soto@splcenter.org | www.splcenter.org
Admitted in Alabama and the District of Columbia

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From: Michael Tierney <mtierney@wadleighlaw.com>
Sent: Wednesday, February 5, 2020 9:39 AM
To: Diego Soto <Diego.Soto@splcenter.org>
Cc: Beth Littrell <beth.littrell@splcenter.org>; Claudia Huerta <claudia.huerta@splcenter.org>; Emily Joselson <ejoselson@langrock.com>; flangrock <flangrock@langrock.com>; Jessica Stone <jessica.stone@splcenter.org>; jswift <jswift@langrock.com>; Julie Jackman <jjackman@langrock.com>; Maya Rajaratnam <maya.rajaratnam@splcenter.org>; Sarah Star <sarahstar.esq@gmail.com>; Scott McCoy <Scott.McCoy@splcenter.org>; srs <srs@sarahstarlaw.com>; Tyler Clemons <Tyler.Clemons@splcenter.org>; Brooks G. McArthur <bmcarthur@jarvismcarthur.com>; Anthony Duprey <anthony@ndp-law.com>; Daniel J. Schmid <dschmid@lc.org>; Horatio Mihet <hmihet@lc.org>; Roger K. Gannam <rgannam@LC.org>; Adam Hochschild <adam@hochschildlaw.com>; Norman C. Smith <norman@normansmithlaw.com>; Richard Boyer <rickboyerlaw@gmail.com>; Toddy Ferguson <cs.fergie@myfairpoint.net>
Subject: RE: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Plaintiffs' First Set of Requests for Production to Defendant Timothy Miller

Diego:

I have reviewed your letter from last week but will need additional time to respond more fully. As an initial matter, however, and as I explained to you on the telephone, I would be happy to provide you with initial disclosures if you would be able to stipulate that this would not be considered a waiver of our personal jurisdiction or lack of service arguments for which the Court currently has a pending motion. Let me know how you would like to proceed.

Michael

Michael J. Tierney, Esq.
Wadleigh, Starr & Peters, PLLC
95 Market Street
Manchester, NH 03101
603-669-4140
603-206-7239 (Direct)
603-669-6018 (Fax)

From: Diego Soto <Diego.Soto@splcenter.org>
Sent: Wednesday, January 29, 2020 12:58 PM
To: Michael Tierney <mtierney@wadleighlaw.com>
Cc: Beth Littrell <beth.littrell@splcenter.org>; Claudia Huerta <claudia.huerta@splcenter.org>; Emily Joselson

<ejoselson@langrock.com>; flangrock <flangrock@langrock.com>; Jessica Stone <jessica.stone@splcenter.org>; jswift <jswift@langrock.com>; Julie Jackman <jjackman@langrock.com>; Maya Rajaratnam <maya.rajaratnam@splcenter.org>; Sarah Star <sarahstar.esq@gmail.com>; Scott McCoy <Scott.McCoy@splcenter.org>; srs <srs@sarahstarlaw.com>; Tyler Clemons <Tyler.Clemons@splcenter.org>; Brooks G. McArthur <bmcArthur@jarvismcarthur.com>; Anthony Duprey <anthony@ndp-law.com>; Daniel J. Schmid <dschmid@lc.org>; Horatio Mihet <hmihet@lc.org>; Roger K. Gannam <rgannam@LC.org>; Adam Hochschild <adam@hochschildlaw.com>; Norman C. Smith <norman@normansmithlaw.com>; Richard Boyer <rickboyerlaw@gmail.com>; Toddy Ferguson <cs.fergie@myfairpoint.net>

Subject: RE: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Plaintiffs' First Set of Requests for Production to Defendant Timothy Miller

Michael,

Thanks again for conferring by telephone on Monday. Please find attached a letter that summarizes our conversation and sets forth Plaintiffs' responses to Mr. Miller's positions on the matters we discussed. Please do let me know if I misunderstood you on any point. I'd appreciate a response by COB on February 5.

Sincerely,
Diego



Diego Soto he/him/his
Staff Attorney | LGBTQ Rights & Special Litigation
Southern Poverty Law Center
T 334.956.8427 C 334.604.1414 F 334.956.8481
diego.soto@splcenter.org | www.splcenter.org
Admitted in Alabama and the District of Columbia

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From: Diego Soto

Sent: Monday, January 27, 2020 12:10 PM

To: 'Michael Tierney' <mtierney@wadleighlaw.com>

Cc: Beth Littrell <beth.littrell@splcenter.org>; Claudia Huerta <claudia.huerta@splcenter.org>; Emily Joselson <ejoselson@langrock.com>; flangrock <flangrock@langrock.com>; Jessica Stone <jessica.stone@splcenter.org>; jswift <jswift@langrock.com>; Julie Jackman <jjackman@langrock.com>; Maya Rajaratnam <maya.rajaratnam@splcenter.org>; Sarah Star <sarahstar.esq@gmail.com>; Scott McCoy <scott.mccoy@splcenter.org>; srs <srs@sarahstarlaw.com>; Tyler Clemons <Tyler.Clemons@splcenter.org>; 'Brooks G. McArthur' <bmcArthur@jarvismcarthur.com>; 'Anthony Duprey' <anthony@ndp-law.com>; 'Daniel J. Schmid' <dschmid@lc.org>; 'Horatio Mihet' <hmihet@lc.org>; 'Roger K. Gannam' <rgannam@LC.org>; 'Adam Hochschild' <adam@hochschildlaw.com>; 'Norman C. Smith' <norman@normansmithlaw.com>; 'Richard Boyer' <rickboyerlaw@gmail.com>; 'Toddy Ferguson' <cs.fergie@myfairpoint.net>

Subject: RE: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Plaintiffs' First Set of Requests for Production to Defendant Timothy Miller

Michael,

In case any of my colleagues or any counsel for the other parties wishes to join, let's instead use this dial-in information:

Direct Dial: 646-558-8656,,826828724#

Dial: 646-558-8656

Meeting ID: 826 828 724



Diego Soto he/him/his
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From: Diego Soto
Sent: Friday, January 24, 2020 1:45 PM
To: Michael Tierney <mtierney@wadleighlaw.com>
Cc: Beth Littrell <beth.littrell@splcenter.org>; Claudia Huerta <claudia.huerta@splcenter.org>; Emily Joselson <ejoselson@langrock.com>; flangrock <flangrock@langrock.com>; Jessica Stone <jessica.stone@splcenter.org>; jswift <jswift@langrock.com>; Julie Jackman <jjackman@langrock.com>; Maya Rajaratnam <maya.rajaratnam@splcenter.org>; Sarah Star <sarahstar.esq@gmail.com>; Scott McCoy <scott.mccoy@splcenter.org>; srs <srs@sarahstarlaw.com>; Tyler Clemons <Tyler.Clemons@splcenter.org>; Brooks G. McArthur <bmcarthur@jarvismcarthur.com>; Anthony Duprey <anthony@ndp-law.com>; Daniel J. Schmid <dschmid@lc.org>; Horatio Mihet <hmihet@lc.org>; Roger K. Gannam <rgannam@LC.org>; Adam Hochschild <adam@hochschildlaw.com>; Norman C. Smith <norman@normansmithlaw.com>; Richard Boyer <rickboyerlaw@gmail.com>; Toddy Ferguson <cs.fergie@myfairpoint.net>
Subject: RE: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Plaintiffs' First Set of Requests for Production to Defendant Timothy Miller

Will do, thanks.



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Admitted in Alabama and the District of Columbia

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From: Michael Tierney <mtierney@wadleighlaw.com>
Sent: Friday, January 24, 2020 1:41 PM
To: Diego Soto <Diego.Soto@splcenter.org>
Cc: Beth Littrell <beth.littrell@splcenter.org>; Claudia Huerta <claudia.huerta@splcenter.org>; Emily Joselson <ejoselson@langrock.com>; flangrock <flangrock@langrock.com>; Jessica Stone <jessica.stone@splcenter.org>; jswift <jswift@langrock.com>; Julie Jackman <jjackman@langrock.com>; Maya Rajaratnam <maya.rajaratnam@splcenter.org>; Sarah Star <sarahstar.esq@gmail.com>; Scott McCoy <Scott.McCoy@splcenter.org>; srs <srs@sarahstarlaw.com>; Tyler Clemons <Tyler.Clemons@splcenter.org>; Brooks G. McArthur <bmcarthur@jarvismcarthur.com>; Anthony Duprey <anthony@ndp-law.com>; Daniel J. Schmid <dschmid@lc.org>; Horatio Mihet <hmihet@lc.org>; Roger K. Gannam <rgannam@LC.org>; Adam Hochschild <adam@hochschildlaw.com>; Norman C. Smith <norman@normansmithlaw.com>; Richard Boyer <rickboyerlaw@gmail.com>; Toddy Ferguson <cs.fergie@myfairpoint.net>
Subject: Re: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Plaintiffs' First Set of Requests for Production to Defendant Timothy Miller

Why don't you call me at 2 Pm on Monday.

Have a good weekend.

Michael

From: Diego Soto <Diego.Soto@splcenter.org>

Sent: Friday, January 24, 2020, 2:29 PM

To: Michael Tierney

Cc: Beth Littrell; Claudia Huerta; Emily Joselson; flangrock; Jessica Stone; jswift; Julie Jackman; Maya Rajaratnam; Sarah Star; Scott McCoy; srs; Tyler Clemons; Brooks G. McArthur; Anthony Duprey; Daniel J. Schmid; Horatio Mihet; Roger K. Gannam; Adam Hochschild; Norman C. Smith; Richard Boyer; Toddy Ferguson

Subject: RE: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Plaintiffs' First Set of Requests for Production to Defendant Timothy Miller

Thanks, Michael. Any time Monday works for me. Just let me know. Also, I only just noticed that you had called my desk on January 9. I'm working now with the IT department to resolve what appears to be a problem with my voicemail after switching desks. In the meantime, you can reach me at my cell phone number below, if you can't reach me at my desk. Apologies for that.



Diego Soto he/him/his

Staff Attorney | LGBTQ Rights & Special Litigation

Southern Poverty Law Center

T 334.956.8427 C 334.604.1414 F 334.956.8481

diego.soto@splcenter.org | www.splcenter.org

Admitted in Alabama and the District of Columbia

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From: Michael Tierney <mtierney@wadleighlaw.com>

Sent: Friday, January 24, 2020 1:22 PM

To: Diego Soto <Diego.Soto@splcenter.org>

Cc: Beth Littrell <beth.littrell@splcenter.org>; Claudia Huerta <claudia.huerta@splcenter.org>; Emily Joselson <ejoselson@langrock.com>; flangrock <flangrock@langrock.com>; Jessica Stone <jessica.stone@splcenter.org>; jswift <jswift@langrock.com>; Julie Jackman <jjackman@langrock.com>; Maya Rajaratnam <maya.rajaratnam@splcenter.org>; Sarah Star <sarahstar.esq@gmail.com>; Scott McCoy <Scott.McCoy@splcenter.org>; srs <srs@sarahstarlaw.com>; Tyler Clemons <Tyler.Clemons@splcenter.org>; Brooks G. McArthur <bmcarthur@jarvismcarthur.com>; Anthony Duprey <anthony@ndp-law.com>; Daniel J. Schmid <dschmid@lc.org>; Horatio Mihet <hmihet@lc.org>; Roger K. Gannam <rgannam@LC.org>; Adam Hochschild <adam@hochschildlaw.com>; Norman C. Smith <norman@normansmithlaw.com>; Richard Boyer <rickboyerlaw@gmail.com>; Toddy Ferguson <cs.fergie@myfairpoint.net>

Subject: Re: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Plaintiffs' First Set of Requests for Production to Defendant Timothy Miller

I am out of town today but happy to discuss on the phone on Monday.

Michael

From: Diego Soto <Diego.Soto@splcenter.org>

Sent: Friday, January 24, 2020, 2:04 PM

To: Michael Tierney

Cc: Beth Littrell; Claudia Huerta; Emily Joselson; flangrock; Jessica Stone; jswift; Julie Jackman; Maya Rajaratnam; Sarah Star; Scott McCoy; srs; Tyler Clemons; Brooks G. McArthur; Anthony Duprey; Daniel J. Schmid; Horatio Mihet; Roger K. Gannam; Adam Hochschild; Norman C. Smith; Richard Boyer; Toddy Ferguson

Subject: RE: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Plaintiffs' First Set of Requests for Production to Defendant Timothy Miller

Michael,

Please let me know by close of business today when you are available to meet and confer by telephone regarding the matters I listed in my email below. Plaintiffs intend to move to compel and to seek payment of expenses, including attorney's fees, if I don't receive a timely response.

Sincerely,

Diego



Diego Soto he/him/his

Staff Attorney | LGBTQ Rights & Special Litigation

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diego.soto@splcenter.org | www.splcenter.org

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From: Diego Soto <Diego.Soto@splcenter.org>

Sent: Tuesday, January 21, 2020 2:44 PM

To: Michael Tierney <mtierney@wadleighlaw.com>

Cc: Beth Littrell <beth.littrell@splcenter.org>; Claudia Huerta <claudia.huerta@splcenter.org>; Diego Soto <Diego.Soto@splcenter.org>; Emily Joselson <ejoselson@langrock.com>; flangrock <flangrock@langrock.com>; Jessica Stone <jessica.stone@splcenter.org>; jswift <jswift@langrock.com>; Julie Jackman <jjackman@langrock.com>; Maya Rajaratnam <maya.rajaratnam@splcenter.org>; Sarah Star <sarahstar.esq@gmail.com>; Scott McCoy <Scott.McCoy@splcenter.org>; srs <srs@sarahstarlaw.com>; Tyler Clemons <Tyler.Clemons@splcenter.org>; Brooks G. McArthur <bmcarthur@jarvismcarthur.com>; Anthony Duprey <anthony@ndp-law.com>; Daniel J. Schmid <dschmid@lc.org>; Horatio Mihet <hmihet@lc.org>; Roger K. Gannam <rgannam@LC.org>; Adam Hochschild <adam@hochschildlaw.com>; Norman C. Smith <norman@normansmithlaw.com>; Richard Boyer <rickboyerlaw@gmail.com>; Toddy Ferguson <cs.fergie@myfairpoint.net>

Subject: RE: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Plaintiffs' First Set of Requests for Production to Defendant Timothy Miller

Michael,

I have yet to receive a response as to the following matters:

1. When Plaintiffs can expect Mr. Miller's initial disclosures;
2. When Plaintiffs can expect Mr. Miller's responses to Plaintiffs' first requests for production;
3. Whether you confirmed with Judge Conrad's former firm whether it has a copy of the criminal discovery documents in its file for Mr. Miller;
4. When Plaintiffs can expect a signed [Certification of Identity](#) authorizing the Department of Justice to release to Plaintiffs information relating to Mr. Miller.

I would appreciate a response to each matter by close of business tomorrow.

Sincerely,
Diego



Diego Soto he/him/his
Staff Attorney | LGBTQ Rights & Special Litigation
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diego.soto@splcenter.org | www.splcenter.org
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From: Diego Soto

Sent: Tuesday, December 17, 2019 2:56 PM

To: Michael Tierney <mtierney@wadleighlaw.com>

Cc: Claudia Huerta <claudia.huerta@splcenter.org>; David Dinielli <David.Dinielli@splcenter.org>; Emily Joselson <ejoselson@langrock.com>; flangrock <flangrock@langrock.com>; Jessica Stone <jessica.stone@splcenter.org>; jswift <jswift@langrock.com>; Julie Jackman <jjackman@langrock.com>; Sarah Star <sarahstar.esq@gmail.com>; srs <srs@sarahstarlaw.com>; Tyler Clemons <Tyler.Clemons@splcenter.org>; Brooks G. McArthur <bmcarthur@jarvismcarthur.com>; Anthony Duprey <anthony@ndp-law.com>; Daniel J. Schmid <dschmid@lc.org>; Horatio Mihet <hmihet@lc.org>; Roger K. Gannam <rgannam@LC.org>; Adam Hochschild <adam@hochschildlaw.com>; Norman C. Smith <norman@normansmithlaw.com>; Toddy Ferguson <cs.fergie@myfairpoint.net>; Hillary A. Borcharding <hborcharding@gravelshea.com>; Linda Bradford Barron <lbarron@gravelshea.com>; Matthew D. Preedom <mpreedom@gravelshea.com>; Robert B. Hemley <rhemley@gravelshea.com>

Subject: RE: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Plaintiffs' First Set of Requests for Production to Defendant Timothy Miller

Michael,

Do you have an update on this?

Thanks,
Diego



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From: Diego Soto

Sent: Monday, December 2, 2019 10:13 AM

To: Michael Tierney <mtierney@wadleighlaw.com>

Cc: Claudia Huerta <claudia.huerta@splcenter.org>; David Dinielli <David.Dinielli@splcenter.org>; Emily Joselson <ejoselson@langrock.com>; flangrock <flangrock@langrock.com>; Jessica Stone <jessica.stone@splcenter.org>; jswift <jswift@langrock.com>; Julie Jackman <jjackman@langrock.com>; Sarah Star <sarahstar.esq@gmail.com>; srs <srs@sarahstarlaw.com>; Tyler Clemons <Tyler.Clemons@splcenter.org>; Brooks G. McArthur <bmcarthur@jarvismcarthur.com>; Anthony Duprey <anthony@ndp-law.com>; Daniel J. Schmid <dschmid@lc.org>; Horatio Mihet <hmihet@lc.org>; Roger K. Gannam <rgannam@LC.org>; Adam Hochschild <adam@hochschildlaw.com>; Norman C. Smith <norman@normansmithlaw.com>; Toddy Ferguson <cs.fergie@myfairpoint.net>; Hillary A. Borcharding <hborcherding@gravelshea.com>; Linda Bradford Barron <lbarron@gravelshea.com>; Matthew D. Preedom <mpreedom@gravelshea.com>; Robert B. Hemley <rhemley@gravelshea.com>

Subject: RE: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Plaintiffs' First Set of Requests for Production to Defendant Timothy Miller

Michael,

Thanks for your reply. I believe the easiest and fastest route would be for you to confirm with Judge Conrad's former firm whether it has a copy of the criminal discovery documents in its file for Mr. Miller. If it does not, then I can submit a FOIA request for those documents. I believe I will need Mr. Miller to fill out and sign this form to submit with the FOIA request:

https://www.justice.gov/sites/default/files/oip/legacy/2014/07/23/cert_ind.pdf

Thanks,
Diego



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From: Michael Tierney <mtierney@wadleighlaw.com>

Sent: Tuesday, November 26, 2019 4:30 PM

To: Diego Soto <Diego.Soto@splcenter.org>

Cc: Claudia Huerta <claudia.huerta@splcenter.org>; David Dinielli <David.Dinielli@splcenter.org>; Emily Joselson <ejoselson@langrock.com>; flangrock <flangrock@langrock.com>; Jessica Stone <jessica.stone@splcenter.org>; jswift <jswift@langrock.com>; Julie Jackman <jjackman@langrock.com>; Sarah Star <sarahstar.esq@gmail.com>; srs <srs@sarahstarlaw.com>; Tyler Clemons <Tyler.Clemons@splcenter.org>; Brooks G. McArthur <bmcarthur@jarvismcarthur.com>; Anthony Duprey <anthony@ndp-law.com>; Daniel J. Schmid <dschmid@lc.org>; Horatio Mihet <hmihet@lc.org>; Roger K. Gannam <rgannam@LC.org>; Adam Hochschild <adam@hochschildlaw.com>; Norman C. Smith <norman@normansmithlaw.com>; Toddy Ferguson <cs.fergie@myfairpoint.net>; Hillary A. Borcharding <hborcherding@gravelshea.com>; Linda Bradford Barron <lbarron@gravelshea.com>; Matthew D.

Preedom <mpreedom@gravelshea.com>; Robert B. Hemley <rhemley@gravelshea.com>

Subject: RE: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Plaintiffs' First Set of Requests for Production to Defendant Timothy Miller

Diego:

As I explained on our telephone call on November 8th, any materials were obtained or turned over to the federal prosecutors in the criminal cases. You had said that you were going to reach out to the prosecutors and see if a FOIA action would be necessary to obtain the documents you seek or if the prosecutors would provide the documents without filing a FOIA request. I trust that you have done one or both of these options. Please let me know if you have success in your FOIA request or informally. There is no reason, that I am aware of, that I would have any greater success in obtaining documents via a FOIA action from the government than you would.

Michael

Michael J. Tierney, Esq.
Wadleigh, Starr & Peters, PLLC
95 Market Street
Manchester, NH 03101
603-669-4140
603-206-7239 (Direct)
603-669-6018 (Fax)

From: Diego Soto <Diego.Soto@splcenter.org>

Sent: Thursday, November 21, 2019 9:13 AM

To: Michael Tierney <mtierney@wadleighlaw.com>

Cc: Claudia Huerta <claudia.huerta@splcenter.org>; David Dinielli <David.Dinielli@splcenter.org>; Emily Joselson <ejoselson@langrock.com>; flangrock <flangrock@langrock.com>; Jessica Stone <jessica.stone@splcenter.org>; jswift <jswift@langrock.com>; Julie Jackman <jjackman@langrock.com>; Sarah Star <sarahstar.esq@gmail.com>; srs <srs@sarahstarlaw.com>; Tyler Clemons <Tyler.Clemons@splcenter.org>; Brooks G. McArthur <bmcarthur@jarvismcarthur.com>; Anthony Duprey <anthony@ndp-law.com>; Daniel J. Schmid <dschmid@lc.org>; Horatio Mihet <hmihet@lc.org>; Roger K. Gannam <rgannam@LC.org>; Adam Hochschild <adam@hochschildlaw.com>; Norman C. Smith <norman@normansmithlaw.com>; Toddy Ferguson <cs.fergie@myfairpoint.net>; Hillary A. Borcharding <hborcharding@gravelshea.com>; Linda Bradford Barron <lbarron@gravelshea.com>; Matthew D. Preedom <mpreedom@gravelshea.com>; Robert B. Hemley <rhemley@gravelshea.com>

Subject: RE: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Plaintiffs' First Set of Requests for Production to Defendant Timothy Miller

Michael,

Thank you again for your phone call on November 8.

Plaintiffs do not possess a copy of the documents you indicated Mr. Miller produced to the government in his criminal case. Have you learned whether Judge Conrad's former firm, Clymer Musser & Conrad, PC, which I believe is now Clymer Musser & Sarno, PC, has retained a copy that they can give to Mr. Miller for production to Plaintiffs?

Also, given the current discovery schedule, please let me know as soon as possible when Plaintiffs can expect Mr. Miller's initial disclosures and discovery responses.

Thanks,
Diego



Diego Soto he/him/his
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diego.soto@splcenter.org | www.splcenter.org
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From: Diego Soto

Sent: Friday, November 8, 2019 2:11 PM

To: Michael J. Tierney <mtierney@wadleighlaw.com>

Cc: Claudia Huerta <claudia.huerta@splcenter.org>; David Dinielli <david.dinielli@splcenter.org>; Emily Joselson <ejoselson@langrock.com>; flangrock <flangrock@langrock.com>; Jessica Stone <jessica.stone@splcenter.org>; jswift <jswift@langrock.com>; Julie Jackman <jjackman@langrock.com>; Sarah Star <sarahstar.esq@gmail.com>; srs <srs@sarahstarlaw.com>; Tyler Clemons <Tyler.Clemons@splcenter.org>; Brooks G. McArthur <bmcarthur@jarvismcarthur.com>; Anthony Duprey <anthony@ndp-law.com>; Daniel J. Schmid <dschmid@lc.org>; Horatio Mihet <hmihet@lc.org>; Roger K. Gannam <rgannam@LC.org>; Adam Hochschild <adam@hochschildlaw.com>; Norman C. Smith <norman@normansmithlaw.com>; Toddy Ferguson <cs.fergie@myfairpoint.net>; Hillary A. Borcharding <hborcharding@gravelshea.com>; Linda Bradford Barron <lbarron@gravelshea.com>; Matthew D. Preedom <mpreedom@gravelshea.com>; Robert B. Hemley <rhemley@gravelshea.com>

Subject: RE: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Plaintiffs' First Set of Requests for Production to Defendant Timothy Miller

Michael,

I received notice of Mr. Miller's motion for reconsideration. Please let me know if, consistent with Local Rule 26(a)(3), Mr. Miller will engage in discovery pending disposition of that motion or if he will instead seek a stay of discovery.

Thanks,
Diego



Diego Soto he/him/his
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From: Diego Soto <Diego.Soto@splcenter.org>

Sent: Wednesday, October 30, 2019 11:09 AM

To: Michael J. Tierney <mtierney@wadleighlaw.com>

Cc: Claudia Huerta <claudia.huerta@splcenter.org>; David Dinielli <David.Dinielli@splcenter.org>; Diego Soto <Diego.Soto@splcenter.org>; Emily Joselson <ejoselson@langrock.com>; flangrock <flangrock@langrock.com>; Jessica Stone <jessica.stone@splcenter.org>; jswift <jswift@langrock.com>; Julie Jackman <jjackman@langrock.com>; Sarah Star <sarahstar.esq@gmail.com>; srs <srs@sarahstarlaw.com>; Tyler Clemons <Tyler.Clemons@splcenter.org>; Brooks G. McArthur <bmcarthur@jarvismcarthur.com>; Anthony Duprey <anthony@ndp-law.com>; Daniel J. Schmid <dschmid@lc.org>; Horatio Mihet <hmihet@lc.org>; Roger K. Gannam <rgannam@LC.org>; Adam Hochschild

<adam@hochschildlaw.com>; Norman C. Smith <norman@normansmithlaw.com>; Toddy Ferguson <cs.fergie@myfairpoint.net>; Hillary A. Borcharding <hborcharding@gravelshea.com>; Linda Bradford Barron <lbarron@gravelshea.com>; Matthew D. Preedom <mpreedom@gravelshea.com>; Robert B. Hemley <rhemley@gravelshea.com>

Subject: Jenkins et al. v. Miller et al., No. 2:12-cv-184 (D. Vt.) - Plaintiffs' First Set of Requests for Production to Defendant Timothy Miller

Michael,

I trust you received notice yesterday of the Court's order denying Defendant Timothy Miller's motion to dismiss. I have attached a copy of that order for your convenience.

Please let me know when Mr. Miller will serve his initial disclosures and produce documents in response to Plaintiffs' first set of requests for production, which were served on Mr. Miller by mail on June 27, 2018. I have attached a copy of those requests and Plaintiffs' supplemental instructions, served on Mr. Miller by mail on August 13, 2018, for your convenience.

Sincerely,
Diego



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Diego Soto

From: Turner, Jason (USAVT) <Jason.Turner4@usdoj.gov>
Sent: Monday, July 13, 2020 8:45 AM
To: Diego Soto
Cc: Jessica Stone; flangrock
Subject: RE: Jenkins FOIA Matter

Follow Up Flag: Follow up
Flag Status: Completed

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Diego,

Sorry it has taken longer than I indicated to get you a response, but I had to follow up a couple of times to get a complete answer on some of the questions. I think that I have been able to fully answer them below in red. I am happy to speak further. I am out of the office this week, but we could schedule a time next week if you would like.

Thanks,
Jason

From: Diego Soto <Diego.Soto@splcenter.org>
Sent: Tuesday, July 7, 2020 4:12 PM
To: Turner, Jason (USAVT) <JTurner4@usa.doj.gov>
Cc: Jessica Stone <jessica.stone@splcenter.org>; flangrock <flangrock@langrock.com>
Subject: RE: Jenkins FOIA Matter

Jason,

Thanks for speaking with me and Jessica today about our FOIA requests. Here are the questions we posed to you and my notes.

EOUSA-2020-001835: All records produced in discovery to or from Timothy David Miller

1. The response summarizes the subject of the FOIA request as "All Records provided in discovery to Timothy David Miller," but the FOIA request also includes all records Timothy Miller produced to the government. Did DOJ search for records responsive to that part of the request? If so, can DOJ provide any information about how those documents were produced (e.g., CDs, paper)? Were they Bates stamped?

You responded yes, DOJ searched for discovery in both directions and that you will check on what DOJ is producing or withholding from what Timothy Miller produced to the government.

I have verified that DOJ search for discovery in both directions. However, I have also verified that Timothy Miller did not produce any discovery to the United States, so the documents that you received or were referred to in your response solely relate to productions made by the United States to Timothy Miller.

EXHIBIT 2

2. The Vaughn index lists a number of CDs identified 1–16 and 18–26. Do these CDs correspond to CDs produced to Timothy Miller in discovery in his criminal case? In other words, did the government produce to Timothy Miller CDs labeled 1–16 and 18–26?

You responded that you don't know and will check.

I have verified that the CDs were produced to Mr. Miller as CD 1-16 and 18-26.

3. The response and Vaughn index reference "packages labeled as Discovery 1–9." Do these packages correspond to packages of documents produced to Timothy Miller in discovery in his criminal case? In other words, did the government produce to Timothy Miller packages of documents labeled 1–9? Were these produced to him in hard copy or in CDs?

You responded that you don't know and will check.

The Discovery packages 1-9 do not correspond to how discovery was produced to Mr. Miller. These actually refer to the number of uploads from our Office (D. Vt.) to EOUSA. The size of the discovery dictated that it could not be uploaded in a single batch, so it was broken into pieces based on ability to upload. Mr. Miller had produced to him hard copy bates labeled documents and the CDs referenced in the preceding answer.

4. Did the government Bates stamp its discovery to Timothy Miller in his criminal case? If so, can DOJ provide the ranges?

You responded that you don't know and will check.

Documents were produced to Timothy Miller with bates labels 000001-016912.

5. Can DOJ provide any information (e.g., names) about the third parties whose consent we'd need for DOJ to produce those withheld documents?

You responded that you don't know but you think the other third parties might be other defendants in related criminal cases.

DOJ could only produce the names in a sealed proceeding or pursuant to a court order.

6. The Vaughn index invokes Exemption (b)(3) for discovery package numbers 1–9. What statute specifically exempts these records from disclosure?

You responded that you don't know but think DOJ is relying on privacy statutes and will check.

After checking with EOUSA it was determined that materials in the package were marked as grand jury materials and the protections under 6(e) were applied.

EOUSA-2020-002374: Certain government trial exhibits from United States v. Kenneth L. Miller, No. 2:11-cr-161 (D. Vt.)

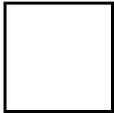
7. Why is DOJ invoking Exemption (b)(6) for exhibits introduced at a public criminal trial? For comparison, EOUSA-2018-001719 requested all exhibits introduced into evidence by the United States in United States v. Philip Zoghates, No. 1:14-cr-00175 (W.D.N.Y.). EOUSA has produced almost all responsive documents and, to my knowledge, did not invoke Exemption (b)(6) to redact or withhold despite the inclusion of PII.

You responded that you don't know and will check.

EOUSA responded that the records were produced in the Zodiates case were marked as trial exhibits. In the Kenneth Miller case the records uploaded to EOUSA were not marked as trial exhibits. A second issue is that even if the records were part of a trial where this individual pled guilty or was found guilty, even then, the defendant may have diminished privacy rights, but they do not lose all rights with regard to the proceedings and the materials used to prosecute them (McNamera v. DOJ, 974 F. Supp. 946, 959 (a convicted person's privacy rights are diminished only with respect to information made public during criminal proceedings against him)). However, even then, the third parties in those records do not lose their privacy rights.

Thanks again for your help on this.

Sincerely,
Diego



Diego Soto he/him/his
Staff Attorney | LGBTQ Rights & Special Litigation
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From: Turner, Jason (USAVT) <Jason.Turner4@usdoj.gov>
Sent: Tuesday, July 7, 2020 12:33 PM
To: Diego Soto <Diego.Soto@splcenter.org>
Subject: RE: Jenkins FOIA Matter

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Sounds good. I will talk to you at 3.

From: Diego Soto <Diego.Soto@splcenter.org>
Sent: Tuesday, July 7, 2020 12:11 PM
To: Turner, Jason (USAVT) <JTurner4@usa.doj.gov>
Cc: Jessica Stone <jessica.stone@splcenter.org>; flangrock <flangrock@langrock.com>
Subject: RE: Jenkins FOIA Matter

Great. Jessica will be joining us too. Let's use the following dial-in. Let me know if you have problems connecting.

Meeting ID: 990 5357 4143
Password: 721541
One tap mobile
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+16465588656,,99053574143#,,,,0#,,721541# US (New York)
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+1 312 626 6799 US (Chicago)
+1 646 558 8656 US (New York)
+1 301 715 8592 US (Germantown)
+1 346 248 7799 US (Houston)

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From: Turner, Jason (USAVT) <Jason.Turner4@usdoj.gov>
Sent: Monday, June 29, 2020 9:08 AM
To: Diego Soto <Diego.Soto@splcenter.org>
Cc: Jessica Stone <jessica.stone@splcenter.org>; flangrock <flangrock@langrock.com>
Subject: RE: Jenkins FOIA Matter

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Let's say 3 p.m. on July 7. Thanks and have a great vacation.

From: Diego Soto <Diego.Soto@splcenter.org>
Sent: Monday, June 29, 2020 10:03 AM
To: Turner, Jason (USAVT) <JTurner4@usa.doj.gov>
Cc: Jessica Stone <jessica.stone@splcenter.org>; flangrock <flangrock@langrock.com>
Subject: Re: Jenkins FOIA Matter

Great. I'm available after 2pm Eastern on July 7; after 1pm Eastern on July 8; and after 4pm Eastern on July 9.

From: Turner, Jason (USAVT) <Jason.Turner4@usdoj.gov>
Sent: Monday, June 29, 2020 7:39:52 AM
To: Diego Soto <Diego.Soto@splcenter.org>
Cc: Jessica Stone <jessica.stone@splcenter.org>; flangrock <flangrock@langrock.com>
Subject: RE: Jenkins FOIA Matter

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Diego,

I am available July 7-9 for a call. I actually leave for vacation on July 10, so I will not be available from July 10-17.

Thanks,
Jason

From: Diego Soto <Diego.Soto@splcenter.org>
Sent: Friday, June 26, 2020 7:33 PM
To: Turner, Jason (USAVT) <JTurner4@usa.doj.gov>
Cc: Jessica Stone <jessica.stone@splcenter.org>; flangrock <flangrock@langrock.com>
Subject: RE: Jenkins FOIA Matter

Thanks, Jason. Sorry for the delayed response. I'll be out next week on vacation, but are you available sometime July 7 through July 10 for a call?



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From: Turner, Jason (USAVT) <Jason.Turner4@usdoj.gov>
Sent: Thursday, June 18, 2020 1:35 PM
To: Diego Soto <Diego.Soto@splcenter.org>
Cc: Jessica Stone <jessica.stone@splcenter.org>; flangrock <flangrock@langrock.com>
Subject: RE: Jenkins FOIA Matter

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Attached are the records that should have been released to Jessica. I will look forward to talking next week.

From: Diego Soto <Diego.Soto@splcenter.org>
Sent: Thursday, June 18, 2020 2:10 PM
To: Turner, Jason (USAVT) <JTurner4@usa.doj.gov>
Cc: Jessica Stone <jessica.stone@splcenter.org>; flangrock <flangrock@langrock.com>
Subject: RE: Jenkins FOIA Matter

Great, thanks. In the meantime, we'll review what has been produced, and I'll follow up with you probably sometime next week.



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From: Turner, Jason (USAVT) <Jason.Turner4@usdoj.gov>
Sent: Thursday, June 18, 2020 1:09 PM

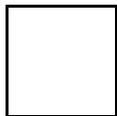
To: Diego Soto <Diego.Soto@splcenter.org>
Cc: Jessica Stone <jessica.stone@splcenter.org>; flangrock <flangrock@langrock.com>
Subject: RE: Jenkins FOIA Matter

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Thanks for checking. I will try to track down the seven pages. I will either have EOUSA re-transmit them or I will send them myself when I receive them.

From: Diego Soto <Diego.Soto@splcenter.org>
Sent: Thursday, June 18, 2020 2:07 PM
To: Turner, Jason (USAVT) <JTurner4@usa.doj.gov>
Cc: Jessica Stone <jessica.stone@splcenter.org>; flangrock <flangrock@langrock.com>
Subject: RE: Jenkins FOIA Matter

Jessica didn't find anything else from EOUSA in her inbox or spam folder, only the attached email with the response.



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From: Turner, Jason (USAVT) <Jason.Turner4@usdoj.gov>
Sent: Thursday, June 18, 2020 12:59 PM
To: Diego Soto <Diego.Soto@splcenter.org>
Cc: Jessica Stone <jessica.stone@splcenter.org>; flangrock <flangrock@langrock.com>
Subject: RE: Jenkins FOIA Matter

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Diego,

That is mostly correct. The 7 pages should have been sent to Jessica by email on the same date as the letter. Could she check her email again for that? If not I will send a request on to EOUSA to resend those pages. Other than that I believe your summary is the same as my understanding.

Thanks,
Jason

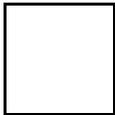
From: Diego Soto <Diego.Soto@splcenter.org>
Sent: Thursday, June 18, 2020 12:13 PM
To: Turner, Jason (USAVT) <JTurner4@usa.doj.gov>
Cc: Jessica Stone <jessica.stone@splcenter.org>; flangrock <flangrock@langrock.com>
Subject: RE: Jenkins FOIA Matter

Jason,

I can confirm that I have the FedEx delivery addressed to Jessica Stone, which contained a letter dated June 2, 2020, regarding "Request Number: EOUSA-2020-002374," and one DVD labeled "Trial Exhibit 57a." I also have the FedEx delivery addressed to me, which contained two DVDs: one labeled "No. 4 timjomiller@gmail.com (1st)" and the other "timjomiller@gmail.com No. 16".

It's my understanding that Jessica is still expecting 7 pages from EOUSA, and I am not expecting anything further at this time. Is that correct?

Thanks,
Diego



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From: Turner, Jason (USAVT) <Jason.Turner4@usdoj.gov>
Sent: Monday, June 15, 2020 7:51 AM
To: Diego Soto <Diego.Soto@splcenter.org>
Cc: Jessica Stone <jessica.stone@splcenter.org>; flangrock <flangrock@langrock.com>
Subject: RE: Jenkins FOIA Matter

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Diego,

Thanks for the update and thanks for sending me a copy. I was actually trying to get one to send to you and Jessica. Let me know if you guys have any trouble locating the disks that were delivered on June 3. Talk to you soon.

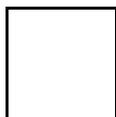
Regards,
Jason

From: Diego Soto <Diego.Soto@splcenter.org>
Sent: Friday, June 12, 2020 6:46 PM
To: Turner, Jason (USAVT) <JTurner4@usa.doj.gov>
Cc: Jessica Stone <jessica.stone@splcenter.org>; flangrock <flangrock@langrock.com>
Subject: RE: Jenkins FOIA Matter

Jason,

I just received the attached emails with DOJ's response to my FOIA request. Jessica found the response to her FOIA request, which I've attached, in her spam folder. We'll review these and be in touch soon.

Thanks,
Diego



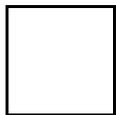
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From: Diego Soto
Sent: Friday, June 12, 2020 1:40 PM
To: Turner, Jason (USAVT) <Jason.Turner4@usdoj.gov>
Cc: Jessica Stone <jessica.stone@splcenter.org>; flangrock <flangrock@langrock.com>
Subject: RE: Jenkins FOIA Matter

Jason, thanks for this information. I'll pass it along to my colleagues, so we can track down what was mailed and emailed. If possible, it'd be helpful to re-send the email to Jessica and copy me and Fritz. I'll let you know when I receive the response to my FOIA request.

We consent to your proposed extension on the deadline to answer the complaint.



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From: Turner, Jason (USAVT) <Jason.Turner4@usdoj.gov>
Sent: Friday, June 12, 2020 1:22 PM
To: Diego Soto <Diego.Soto@splcenter.org>
Cc: Jessica Stone <jessica.stone@splcenter.org>; flangrock <flangrock@langrock.com>
Subject: RE: Jenkins FOIA Matter

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Diego,

I was able to get some additional information after I received your response. In response to the request by Ms. Stone, she should have received an email response and a FedEx delivery. The FedEx delivery was made and signed for on June 3. The email should have been received on or around May 29. The response to your request actually has not gone out yet, but was scheduled for today and will be delivered via email.

In light of your motion to file the Second Amended Complaint and the need to evaluate the responses that have been sent, would you be willing to agree to a further extension that defers an answer until the Second Amended Complaint is entered by the Court?

Thanks,
Jason

From: Diego Soto <Diego.Soto@splcenter.org>
Sent: Friday, June 12, 2020 1:26 PM
To: Turner, Jason (USAVT) <JTurner4@usa.doj.gov>
Cc: Jessica Stone <jessica.stone@splcenter.org>; flangrock <flangrock@langrock.com>
Subject: Re: Jenkins FOIA Matter

Jason, I just learned that my colleagues who have been sorting and distributing mail only go into the office once a week and did not see any mail for me or Jessica when they checked earlier this week. They plan to go into the office again on Tuesday. Let me know if this poses any problems for you given Monday's deadline to answer, and I'll try to find another option.

From: Turner, Jason (USAVT) <Jason.Turner4@usdoj.gov>
Sent: Thursday, June 11, 2020 9:24:57 AM
To: Diego Soto <Diego.Soto@splcenter.org>
Cc: Jessica Stone <jessica.stone@splcenter.org>; flangrock <flangrock@langrock.com>
Subject: RE: Jenkins FOIA Matter

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

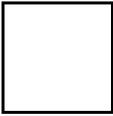
Diego,

You are correct that they would have been sent by mail or FedEx. I know of at least three deliveries that should have been made. You each should have received a response and documents from the EOUSA FOIA office related to your respective requests. Jessica should have also received disks that were sent directly from our office. There could be others that I was not aware of, but I know of at least those three. Let me know what you find.

Thanks,
Jason

From: Diego Soto <Diego.Soto@splcenter.org>
Sent: Thursday, June 11, 2020 10:21 AM
To: Turner, Jason (USAVT) <JTurner4@usa.doj.gov>
Cc: Jessica Stone <jessica.stone@splcenter.org>; flangrock <flangrock@langrock.com>
Subject: RE: Jenkins FOIA Matter

Thanks, Jason. Your and your colleagues' work on this is appreciated. I've copied my colleague Jessica Stone. I assume you mean the responses were sent by mail, given that I haven't seen anything in my email inbox, and it's my understanding that Jessica has not either. If that's right, we'll check with our colleagues who have been collecting and distributing mail from our offices.



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From: Turner, Jason (USAVT) <Jason.Turner4@usdoj.gov>
Sent: Thursday, June 11, 2020 8:51 AM
To: flangrock <flangrock@langrock.com>
Cc: Diego Soto <Diego.Soto@splcenter.org>
Subject: RE: Jenkins FOIA Matter

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

No problem. I still think it will be useful to have a discussion to make sure that everything that was sent was actually received (since it was coming from multiple locations and delivered to different recipients), and to see if we have any issues with the response. This has been an interesting time for us to handle the request with only having limited staff able to access the office and trying to pull things together. The staff assigned to handle this in our office can only be in the space 4 days out of every 14 day period per the COVID-19 guidelines in place. I just want to be proactive and keep things moving forward.

Thanks,
Jason

From: Fritz Langrock <FLangrock@langrock.com>
Sent: Thursday, June 11, 2020 9:41 AM
To: Turner, Jason (USAVT) <JTurner4@usa.doj.gov>
Cc: Diego Soto <Diego.Soto@splcenter.org>
Subject: Re: Jenkins FOIA Matter

Jason. Probably my fault. I should have checked before filing.

Sent from my iPhone

On Jun 11, 2020, at 9:40 AM, Turner, Jason (USAVT) <Jason.Turner4@usdoj.gov> wrote:

Diego,

Hope that you have been well. I saw the Motion to Amend the Complaint today. We are still in agreement that this solves the standing problem. I had one concern after reading the Second Amended Complaint. It states that "[t]o this day, Defendant has not produced to Plaintiff any records responsive to Plaintiff's FOIA requests." I know that we have sent responses and documents. In fact you should have received a couple separate deliveries. Some should have been sent from the FOIA office and at least one delivery would have come directly from USAO for the District of Vermont. If you have not received anything please let me know immediately so that I can try to figure out what is happening with

the transmittal of the responses. If you have received responses I would like to discuss any particular concerns/remaining issues that you have with the responses so that we can try to limit the issues. I don't have Jessica's email or I would have included her on this email as well. I know that some of the responses were sent to her attention. Could you please forward this to her and also share her email.

I look forward to talking soon.

Thanks,
Jason

Jason Turner
Assistant United States Attorney
U.S. Attorney's Office for the District of Vermont
11 Elmwood Avenue, 3rd Floor
Burlington, VT 05401
802-951-6725
802-951-6540 (fax)
Jason.Turner4@usdoj.gov

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U.S. Department of Justice

Executive Office for United States Attorneys

Freedom of Information and Privacy Staff

*Suite 5.400, 3CON Building
175 N Street, NE
Washington, DC 20530*

*(202) 252-6020
FAX (202) 252-6048*

June 12, 2020

Sent via email: diego.soto@splcenter.org

Diego A. Soto
Southern Poverty Law Center
400 Washington Avenue
Montgomery, AL 36104

Request Number: EOUSA-2020-001835
Date of Receipt: March 2, 2020
Subject of Request: All Records provided in discovery to Timothy David Miller

Dear Mr. Soto:

Your request for records under the Freedom of Information Act/Privacy Act has been processed. This letter constitutes a reply from the Executive Office for United States Attorneys, the official record-keeper for all records located in this office and the various United States Attorneys' Office.

To provide you with the greatest degree of access authorized by the Freedom of Information Act and the Privacy Act, we have considered your request in light of the provisions of both statutes.

The records you seek are located in a Privacy Act system of records that, in accordance with regulations promulgated by the Attorney General, is exempt from the access provisions of the Privacy Act. 28 CFR § 16.81. We have also processed your request under the Freedom of Information Act and are making all records required to be released, or considered appropriate for release as a matter of discretion, available to you. In response to your request, the following records are partially disclosed to you:

2 CDs are being released in full and sent to you via FedEx;
51 page(s) from CD 22 are being released in part;
4 pages from CD 22 are being withheld in full;
14,711 pages from packages labeled as Discovery 1-9 are being withheld in full; and,

EXHIBIT

3

12 CDs are being withheld in full. The redacted documents were reviewed to determine if any information could be segregated for release.¹

The exemption(s) cited for withholding records or portions of records are marked below:

- (b)(3)
- (b)(6)
- (b)(7)(c)

An enclosure to this letter explains the exemptions in more detail. Also, we would like to note that while you provided an authorization for one individual, you did not provide authorizations for other third parties included in these records.

Our office located records that originated with another government component. **These records were found in the U.S. Attorney's Office files.** Once we have received the above payment, these records will be referred to the following component(s) listed for review and direct response to you:

There are public records which may be obtained from the clerk of the court or this office, upon specific request. If you wish to obtain a copy of these records, you must submit a new request. These records will be provided to you subject to copying fees.

Please note that your original letter was split into separate files ("requests"), for processing purposes, based on the nature of what you sought. Each file was given a separate Request Number (listed below), for which you will receive a separate response:

See additional information attached.

This is the final action on this above-numbered request. If you are not satisfied with my response to this request, you may administratively appeal by writing to the Director, U.S. Department of Justice, Office of Information Policy, Sixth Floor, 441 G Street NW, Washington, DC 20001, or you may submit an appeal through OIP's FOIAonline portal by creating an account on the following web site: <https://foiaonline.gov>. Your appeal must be postmarked or electronically transmitted within ninety (90) days of the date of my response to your request. If you submit your appeal by mail, both the letter and the envelope should be clearly marked "Freedom of Information Act Appeal."

You may contact our FOIA Public Liaison at the telephone number listed above for any further assistance and to discuss any aspect of your request. Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information

¹ The pages released in part or withheld in full are the pages from CD 22. As this CD was part of a collection, the pages for which there was an authorization are attached as part of this .pdf. While not required, in an effort to provide transparency, I have also included a Vaughn Index to provide transparency and additional details about the documents.

for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001; e-mail at ogis@nara.gov; telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kevin Krebs", is written over a light pink rectangular background.

Kevin Krebs
Assistant Director

Enclosure(s)

EXPLANATION OF EXEMPTIONS

FOIA: TITLE 5, UNITED STATES CODE, SECTION 552

- (b)(1) (A) specifically authorized under criteria established by and Executive order to be kept secret in the in the interest of national defense or foreign policy and (B) are in fact properly classified pursuant to such Executive order;
- (b)(2) related solely to the internal personnel rules and practices of an agency;
- (b)(3) specifically exempted from disclosure by statute (other than section 552b of this title), provided that such statute (A) requires that the matters be withheld from the public in such a manner as to leave no discretion on the issue, or (B) establishes particular criteria for withholding or refers to particular types of matters to be withheld;
- (b)(4) trade secrets and commercial or financial information obtained from a person and privileged or confidential;
- (b)(5) inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than an agency in litigation with the agency;
- (b)(6) personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy;
- (b)(7) records or information compiled for law enforcement purposes, but only the extent that the production of such law enforcement records or information (A) could reasonably be expected to interfere with enforcement proceedings, (B) would deprive a person of a right to a fair trial or an impartial adjudication, (C) could reasonably be expected to constitute an unwarranted invasion of personal privacy, (D) could reasonably be expected to disclose the identity of a confidential source, (E) would disclose techniques and procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law, or (F) could reasonably be expected to endanger the life or physical safety of any individual.
- (b)(8) contained in or related to examination, operating, or condition reports prepared by, on behalf of, or for the use of an agency responsible for the regulation or supervision of financial institutions; or
- (b)(9) geological and geophysical information and data, including maps, concerning wells.

PRIVACY ACT: TITLE 5, UNITED STATES CODE, SECTION 552a

- (d)(5) information compiled in reasonable anticipation of a civil action proceeding;
- (j)(2) material reporting investigative efforts pertaining to the enforcement of criminal law including efforts to prevent, control, or reduce crime or apprehend criminals;
- (k)(1) information which is currently and properly classified pursuant to Executive Order 12356 in the interest of the national defense or foreign policy, for example, information involving intelligence sources or methods;
- (k)(2) investigatory material compiled for law enforcement purposes, other than criminal, which did not result in loss of a right, benefit or privilege under Federal programs, or which would identify a source who furnished information pursuant to a promise that his/her identity would be held in confidence;
- (k)(3) material maintained in connection with providing protective services to the President of the United States or any other individual pursuant to the authority of Title 18, United States Code, Section 3056;
- (k)(4) required by statute to be maintained and used solely as statistical records;
- (k)(5) investigatory material compiled solely for the purpose of determining suitability eligibility, or qualification for Federal civilian employment or for access to classified information, the disclosure of which would reveal the identity of the person who furnished information pursuant to a promise that his identity would be held in confidence;
- (k)(6) testing or examination material used to determine individual qualifications for appointment or promotion in Federal Government service the release of which would compromise the testing or examination process;
- (k)(7) material used to determine potential for promotion in the armed services, the disclosure of which would reveal the identity of the person who furnished the material pursuant to a promise that his identity would be held in confidence.



Executive Office for United States Attorneys

Freedom of Information and Privacy Staff

Suite 5.400, 3CON Building
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Washington, DC 20530

(202) 252-6020
FAX (202) 252-6048

Requester: Diego A. Soto

Request Number: EOUSA-2020-001835

Date of Receipt: March 2, 2020

Subject of Request: All Records provided in discovery to Timothy David Miller

Legend

WIF- Withhold in Full

RIF- Release in Full

RIP- Release in Part

CD Number	Description of Record	Disclosure	Comments
1 ¹	AOL email records of third party	WIF (b)(6)	Email account for a third party for which no authorization was provided, including names, email addresses and financial information
2	Netzero email records of third party	WIF (b)(6)	Email account for a third party for which no authorization was provided, including names, email addresses and financial information
3	Facebook account information	WIF (b)(6)	Third party information for which no authorization was provided
4	Gmail account of Tim Miller	RIF	
5	Facebook account information	WIF (b)(6)	Third party information for which no authorization was provided
6	Facebook account information	WIF (b)(6)	Third party information for which no authorization was provided
7	Netzero email records	WIF	Email account for a third

¹ There is one CD containing the combined records of CD 1, 9, 11 and 18-26. The information labeled on that CD as CD 22, the Vivophone records of Tim Miller has been printed from the CD and are provided in .pdf form as an attachment to the disclosure email.

	of third party	(b)(6)	party for which no authorization was provided, including names, email addresses and financial information
8	Facebook account information	WIF (b)(6)	Third party information for which no authorization was provided
9	AOL email records of third party	WIF (b)(6)	Email account for a third party for which no authorization was provided, including names, email addresses and financial information
10	Yahoo email records of third party	WIF (b)(6)	Email account for a third party for which no authorization was provided, including names, email addresses and financial information
11	AOL email records of third party	WIF (b)(6)	Names, email addresses and financial information of a third party for which authorization was not been provided
12	Gmail records of third party	WIF (b)(6)	Email account for a third party for which no authorization was provided, including names, email addresses and financial information
13	Hotmail records of third party	WIF (b)(6)	Names, email addresses and financial information of a third party for which authorization had not been provided
14	Gmail records of third party	WIF (b)(6)	Email account for a third party for which no authorization was provided, including names, email addresses and financial information
15	Gmail records of third party	WIF (b)(6)	Email account for a third party for which no authorization was provided, including names, email addresses and financial information
16	Gmail account of Tim Miller	RIF	

18	Vonage phone records of third party	WIF (b)(6)	Names, phone numbers and account information of a third party for which authorization had not been provided
19	Vonage phone records of third party	WIF (b)(6)	Names, phone numbers and account information of a third party for which authorization had not been provided
20	Verizon phone records of third party	WIF (b)(6)	Names, phone numbers and account information of a third party for which authorization had not been provided
21	Verizon phone records of third party	WIF (b)(6)	Names, phone numbers and account information of a third party for which authorization had not been provided
22	Vivophone records of Tim Miller (attached as .pdf)	RIP (b)(6)	The records identified as CD 22 were extracted from the CD and converted to a .pdf document. Names and phone numbers of third parties for which authorization had not been provided
23	Verizon phone records of third party	WIF (b)(6)	Names, phone numbers and account information of a third party for which authorization had not been provided
24	Verizon phone records of third party	WIF (b)(6)	Names, phone numbers and account information of a third party for which authorization had not been provided
25	Verizon phone records of third party	WIF (b)(6)	Names, phone numbers and account information of a third party for which authorization had not been provided
26	Computer Forensic Analysis Report and Related Files	WIF (b)(6)	Computer information, emails and communications belonging to third parties for which authorization was not provided
Discovery Number	Description of Record	Disclosure	Comments
1	851 pages – documents pertaining to third parties provided in discovery, including investigation reports, phone records, and testimony from child	WIF (b)(3), (b)(6), (b)(7)(c)	Third party information for which authorization was not provided

	custody matters and grand jury records		
2	851 pages – documents pertaining to third parties provided in discovery, including phone records, and testimony from child custody matters	(b)(3), (b)(6), (b)(7)(c)	Third party information for which authorization was not provided
3	1749 pages – documents pertaining to third parties provided in discovery, including investigatory records, testimony from child custody matters and grand jury records	(b)(3), (b)(6), (b)(7)(c)	Third party information for which authorization was not provided
4	1591 pages– documents pertaining to third parties provided in discovery including witness statements, financial information, affidavits, and testimony records	(b)(3), (b)(6), (b)(7)(c)	Third party information for which authorization was not provided
5	2123 pages– documents pertaining to third parties provided in discovery, including investigation records, interview phone records, and testimony from child custody matters and grand jury records	(b)(3), (b)(6), (b)(7)(c)	Third party information for which authorization was not provided
6	2792 pages– documents pertaining to third parties provided in discovery, including phone records, and testimony and grand jury records	(b)(3), (b)(6), (b)(7)(c)	Third party information for which authorization was not provided
7	1404 pages– documents pertaining to third parties provided in discovery,	(b)(3), (b)(6), (b)(7)(c)	Third party information for which authorization was not provided

	including phone records, and testimony from child custody matters and grand jury records		
8	3183 pages– documents pertaining to third parties provided in discovery, including phone records, and testimony from child custody matters and grand jury records	(b)(3), (b)(6), (b)(7)(c)	Third party information for which authorization was not provided
9	501 pages– documents pertaining to third parties provided in discovery, including phone records, and testimony from child custody matters and grand jury records	(b)(3), (b)(6), (b)(7)(c)	Third party information for which authorization was not provided

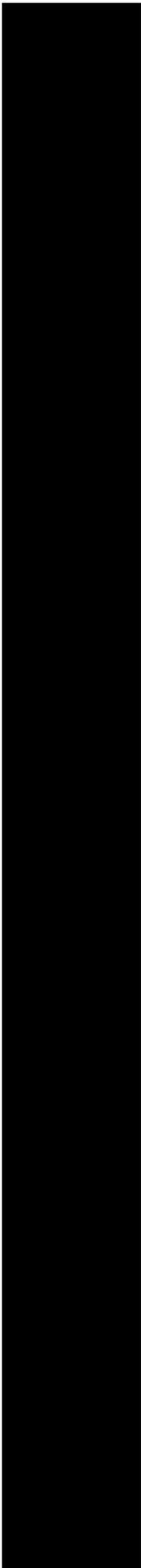
- Note that all responsive records were reasonably segregated.

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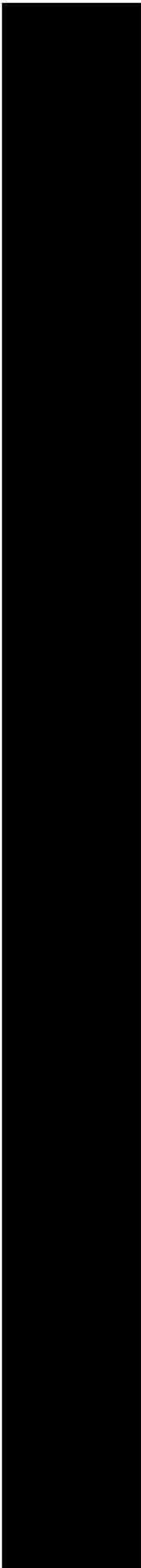
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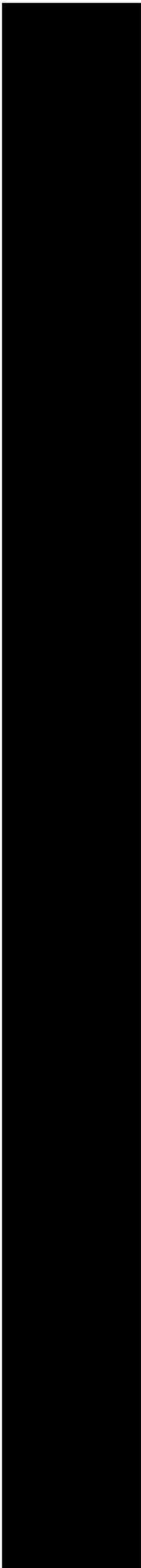
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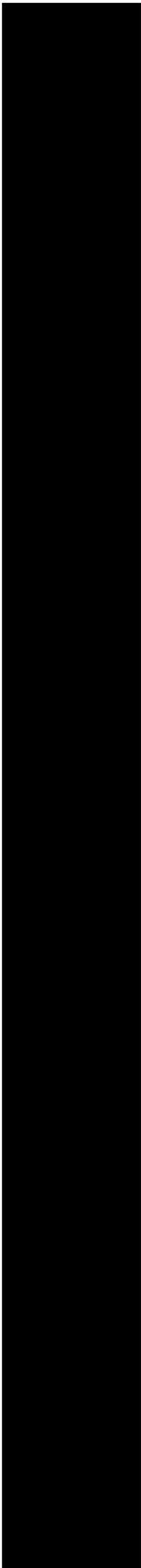
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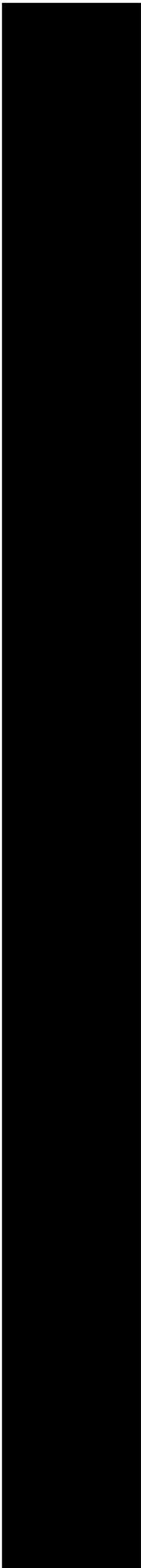
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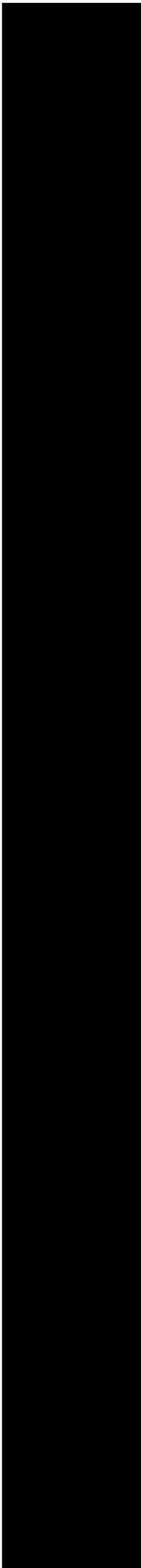
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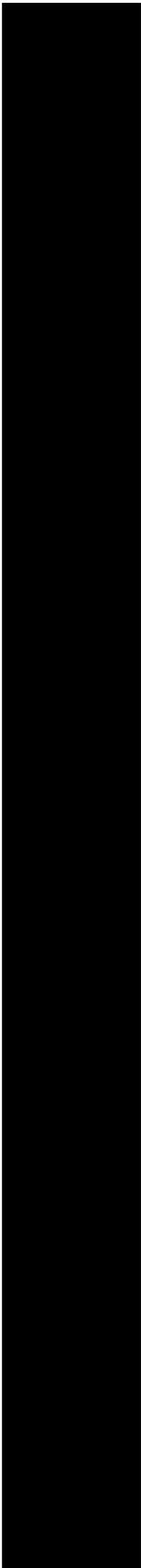
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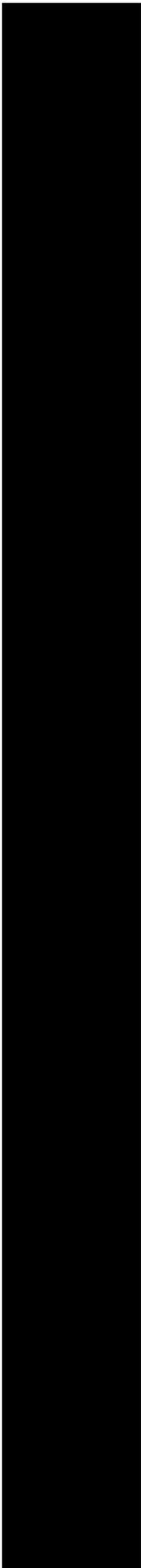
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11/21/2009 19:37	11/21/2009	0:19:40
11/23/2009 12:21	11/23/2009	0:19:20
11/23/2009 14:38	11/23/2009	0:00:05
11/26/2009 14:00	11/26/2009	0:18:09
11/26/2009 14:20	11/26/2009	0:00:27
11/26/2009 15:45	11/26/2009	0:01:25
11/27/2009 14:02	11/27/2009	0:12:00
11/28/2009 12:20	11/28/2009	0:11:14
11/29/2009 18:12	11/29/2009	0:05:30
11/29/2009 18:50	11/29/2009	0:01:31
11/29/2009 19:19	11/29/2009	0:12:32
12/1/2009 12:09	12/1/2009	0:00:04
12/1/2009 12:01	12/1/2009	0:07:06
12/1/2009 12:10	12/1/2009	0:27:48



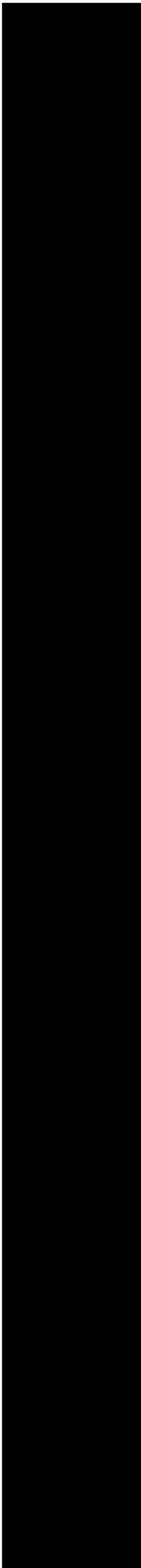
12/1/2009 15:06	12/1/2009	0:02:33
12/1/2009 16:49	12/1/2009	0:03:32
12/1/2009 20:53	12/1/2009	0:13:44
12/2/2009 11:31	12/2/2009	0:33:51
12/2/2009 13:06	12/2/2009	0:24:09
12/2/2009 14:13	12/2/2009	0:09:30
12/2/2009 14:29	12/2/2009	0:01:30
12/4/2009 21:08	12/4/2009	0:43:54
12/7/2009 20:47	12/7/2009	0:02:26
12/8/2009 17:03	12/8/2009	0:06:14
12/4/2009 16:31	12/4/2009	0:00:08
12/7/2009 15:14	12/7/2009	0:01:45
12/7/2009 23:51	12/7/2009	0:02:45
12/8/2009 15:10	12/8/2009	0:03:17
12/8/2009 12:06	12/8/2009	0:00:42
12/8/2009 0:23	12/8/2009	0:16:03
12/7/2009 13:27	12/7/2009	0:00:05
12/8/2009 20:51	12/8/2009	0:00:04
12/7/2009 13:15	12/7/2009	0:00:05
12/8/2009 21:02	12/8/2009	0:00:02
12/6/2009 19:30	12/6/2009	0:03:06
12/7/2009 22:40	12/7/2009	0:41:43
12/7/2009 12:01	12/7/2009	0:30:29
12/9/2009 22:04	12/9/2009	1:03:06
12/4/2009 16:44	12/4/2009	0:04:32
12/8/2009 23:02	12/8/2009	1:23:40
12/8/2009 11:20	12/8/2009	0:05:34
12/9/2009 11:44	12/9/2009	0:30:59
12/8/2009 11:46	12/8/2009	0:10:27
12/8/2009 13:40	12/8/2009	0:10:42
12/7/2009 13:14	12/7/2009	0:00:05
12/8/2009 16:27	12/8/2009	0:14:53
12/8/2009 20:49	12/8/2009	0:00:06
12/10/2009 11:55	12/10/2009	0:00:26
12/8/2009 15:05	12/8/2009	0:04:40
12/29/2009 14:16	12/29/2009	0:13:21
12/29/2009 19:26	12/29/2009	0:00:05
12/29/2009 19:27	12/29/2009	0:00:06
12/29/2009 19:30	12/29/2009	0:00:06
12/29/2009 19:58	12/29/2009	0:00:05
12/29/2009 19:56	12/29/2009	0:00:14
12/29/2009 21:38	12/29/2009	0:20:36
12/31/2009 14:26	12/31/2009	0:08:35
12/31/2009 14:21	12/31/2009	0:00:09
1/1/2010 15:34	1/1/2010 --:--:--	
1/1/2010 18:30	1/1/2010	0:09:40
1/5/2010 16:05	1/5/2010 --:--:--	
1/5/2010 16:05	1/5/2010	0:12:14
1/5/2010 16:45	1/5/2010	0:28:22
1/6/2010 10:55	1/6/2010	0:08:36



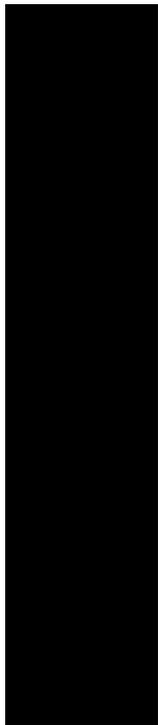
1/6/2010 16:42	1/6/2010	0:00:38
1/6/2010 16:43	1/6/2010	0:08:10
1/7/2010 21:55	1/7/2010	0:00:16
1/7/2010 22:11	1/7/2010	1:40:03
1/8/2010 21:48	1/8/2010	1:08:14
1/10/2010 16:07	1/10/2010	0:04:07
1/10/2010 16:44	1/10/2010	0:04:43
1/11/2010 19:51	1/11/2010	0:23:28
1/12/2010 12:41	1/12/2010	0:03:30
1/14/2010 14:59	1/14/2010	0:12:34
1/14/2010 15:26	1/14/2010	0:03:27
1/14/2010 15:53	1/14/2010	0:08:36
1/14/2010 22:38	1/14/2010	1:19:06
1/16/2010 22:55	1/16/2010	0:17:08
1/22/2010 22:57	1/22/2010	2:03:14
1/22/2010 22:55	1/22/2010	0:00:12
1/23/2010 22:25	1/23/2010	0:00:35
1/23/2010 22:27	1/23/2010	0:00:08
1/23/2010 22:29	1/23/2010	0:00:07
1/23/2010 22:27	1/23/2010	0:09:32
1/23/2010 22:37	1/23/2010	1:11:41
1/24/2010 22:20	1/24/2010	1:44:48
1/27/2010 15:59	1/27/2010	0:00:32
1/27/2010 20:26	1/27/2010	1:41:09
1/28/2010 9:54	1/28/2010	0:16:25
1/28/2010 12:37	1/28/2010	0:00:10
1/28/2010 12:35	1/28/2010 ---:--:--	
1/28/2010 12:38	1/28/2010	0:00:17
1/28/2010 12:34	1/28/2010 ---:--:--	
1/29/2010 12:01	1/29/2010	0:00:07
1/29/2010 12:24	1/29/2010	0:00:24
1/30/2010 21:44	1/30/2010	0:00:08
1/30/2010 21:51	1/30/2010 ---:--:--	
1/31/2010 14:29	1/31/2010	0:52:00
2/1/2010 18:51	2/1/2010	0:16:35
2/1/2010 21:05	2/1/2010	0:41:46
2/2/2010 11:50	2/2/2010	0:00:05
2/4/2010 11:18	2/4/2010	0:01:10
2/5/2010 13:27	2/5/2010	0:03:18
2/8/2010 19:34	2/8/2010	0:16:52
2/8/2010 19:55	2/8/2010	0:05:18
2/10/2010 12:22	2/10/2010	0:29:04
2/16/2010 20:28	2/16/2010	0:00:26
2/16/2010 20:36	2/16/2010	0:09:05
2/18/2010 21:56	2/18/2010	0:44:09
2/20/2010 7:18	2/20/2010	0:00:09
2/20/2010 10:08	2/20/2010	0:00:05
2/20/2010 10:50	2/20/2010	0:00:06
2/20/2010 13:10	2/20/2010	0:04:05
2/22/2010 16:18	2/22/2010	0:36:05



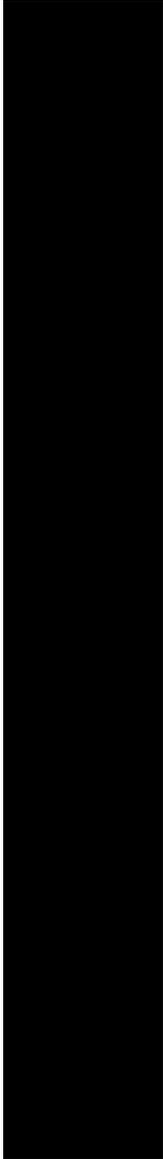
2/22/2010 16:13	2/22/2010	0:02:26
2/22/2010 21:11	2/22/2010	0:00:05
2/22/2010 22:03	2/22/2010	0:05:30
2/24/2010 9:24	2/24/2010	0:36:44
2/25/2010 20:47	2/25/2010	0:10:05
2/26/2010 11:56	2/26/2010	0:03:03
2/27/2010 22:03	2/27/2010	0:33:13
2/27/2010 22:39	2/27/2010	1:12:04
3/1/2010 9:10	3/1/2010	0:12:19
3/10/2010 11:19	3/10/2010	0:00:21
3/10/2010 11:34	3/10/2010	0:18:46
3/11/2010 11:11	3/11/2010	0:16:17
3/16/2010 18:58	3/16/2010	0:00:15
3/16/2010 19:00	3/16/2010	0:00:47
3/18/2010 21:22	3/18/2010	0:00:24
3/18/2010 21:23	3/18/2010	0:00:09
3/18/2010 21:27	3/18/2010	0:00:06
3/18/2010 21:39	3/18/2010	0:00:19
3/23/2010 15:13	3/23/2010	0:09:37
3/23/2010 17:31	3/23/2010	0:04:47
3/27/2010 22:28	3/27/2010	0:34:24
3/28/2010 16:34	3/28/2010	1:15:37
3/28/2010 21:43	3/28/2010	1:14:11
3/31/2010 7:51	3/31/2010	0:05:15
3/31/2010 15:46	3/31/2010	0:04:52
3/31/2010 17:01	3/31/2010	0:19:02
4/4/2010 20:17	4/4/2010	0:00:17
4/12/2010 11:44	4/12/2010	0:01:36
4/18/2010 22:03	4/18/2010	0:00:27
4/21/2010 18:46	4/21/2010	0:09:57
4/25/2010 17:35	4/25/2010	0:13:57
4/25/2010 17:31	4/25/2010	0:03:09
4/26/2010 12:09	4/26/2010	0:03:05
4/26/2010 12:38	4/26/2010	0:03:28
4/27/2010 18:12	4/27/2010	0:12:00
5/2/2010 16:51	5/2/2010	0:51:46
5/2/2010 17:44	5/2/2010	0:41:40
5/4/2010 15:15	5/4/2010	--:--:--
5/5/2010 12:55	5/5/2010	0:09:10
5/6/2010 12:54	5/6/2010	0:00:40
5/6/2010 14:16	5/6/2010	0:13:01
5/6/2010 23:56	5/6/2010	0:12:14
5/7/2010 0:09	5/7/2010	0:27:56
5/12/2010 14:34	5/12/2010	0:43:14
5/25/2010 8:00	5/25/2010	0:51:48
5/28/2010 21:38	5/28/2010	0:10:11
6/3/2010 22:43	6/3/2010	0:11:07
6/4/2010 11:08	6/4/2010	0:07:04
6/6/2010 17:02	6/6/2010	0:04:13
6/6/2010 20:58	6/6/2010	0:43:56



6/6/2010 21:57	6/6/2010	1:12:41
6/10/2010 17:20	6/10/2010	0:14:53
6/11/2010 17:37	6/11/2010	0:01:47
6/11/2010 17:47	6/11/2010	0:30:21
6/12/2010 9:53	6/12/2010	0:30:45
6/12/2010 12:58	6/12/2010	0:10:54
6/14/2010 18:09	6/14/2010	0:10:40
6/22/2010 17:49	6/22/2010	0:11:39
6/23/2010 10:09	6/23/2010	0:08:24
6/28/2010 13:39	6/28/2010	0:12:17
6/28/2010 18:05	6/28/2010	0:10:30
7/1/2010 15:41	7/1/2010	0:10:50
7/2/2010 20:08	7/2/2010	0:10:12
7/2/2010 21:47	7/2/2010	0:05:10
7/5/2010 11:16	7/5/2010	0:18:09
7/5/2010 18:56	7/5/2010	0:43:07
7/16/2010 19:17	7/16/2010	0:22:51
7/16/2010 22:01	7/16/2010	0:02:58
7/17/2010 19:55	7/17/2010	0:00:32
7/17/2010 19:57	7/17/2010	0:00:29
7/17/2010 19:54	7/17/2010	0:00:34
7/17/2010 20:33	7/17/2010	0:22:41
7/17/2010 20:57	7/17/2010	1:00:04
7/19/2010 14:55	7/19/2010	0:22:20
7/19/2010 21:19	7/19/2010	0:27:19
7/19/2010 21:49	7/19/2010	0:10:38
7/19/2010 21:47	7/19/2010	0:00:48
7/19/2010 22:01	7/19/2010	0:37:26
7/20/2010 13:13	7/20/2010	0:07:07
7/20/2010 13:21	7/20/2010	0:06:42
7/20/2010 16:39	7/20/2010	0:24:56
7/20/2010 16:39	7/20/2010	0:00:21
7/20/2010 16:33	7/20/2010	0:05:11
7/23/2010 7:43	7/23/2010	0:04:55
7/23/2010 7:48	7/23/2010	0:47:11
7/23/2010 13:12	7/23/2010	0:23:33
8/5/2010 18:14	8/5/2010	0:53:34
8/10/2010 17:59	8/10/2010	0:04:11
8/10/2010 18:07	8/10/2010	0:29:05
8/10/2010 18:38	8/10/2010	0:34:49
8/19/2010 20:11	8/19/2010	0:16:21
8/26/2010 19:51	8/26/2010	0:00:32
8/26/2010 19:53	8/26/2010	0:50:22
9/20/2010 13:08	9/20/2010	0:00:49
9/20/2010 13:09	9/20/2010	0:36:54
9/20/2010 13:48	9/20/2010	0:14:13
9/20/2010 13:47	9/20/2010	0:01:01
9/21/2010 19:20	9/21/2010	0:02:38
9/21/2010 21:12	9/21/2010	0:41:57
9/24/2010 11:27	9/24/2010	0:11:49



10/5/2010 17:48	10/5/2010	0:06:26
10/5/2010 17:55	10/5/2010	0:00:51
10/5/2010 17:57	10/5/2010	0:42:24
10/5/2010 18:40	10/5/2010	0:10:31
10/6/2010 22:11	10/6/2010	0:21:42
10/8/2010 22:03	10/8/2010	0:42:36
10/9/2010 12:15	10/9/2010	0:38:39
10/10/2010 22:01	10/10/2010	1:10:02
10/11/2010 21:09	10/11/2010	0:01:55
10/12/2010 21:29	10/12/2010	1:10:51
10/13/2010 22:07	10/13/2010	0:05:13
10/16/2010 17:46	10/16/2010	0:01:41
10/16/2010 17:50	10/16/2010	0:14:54
10/16/2010 18:05	10/16/2010	0:06:55
10/16/2010 18:13	10/16/2010	0:04:11
10/16/2010 22:12	10/16/2010 --:--:--	
10/17/2010 9:29	10/17/2010	0:00:58
10/26/2010 8:26	10/26/2010	0:23:04
10/27/2010 16:16	10/27/2010	0:05:15
11/5/2010 15:59	11/5/2010	0:51:15
11/12/2010 18:49	11/12/2010	0:00:59



Received Calls

5/5/2009 16:35	0:00:09
5/8/2009 12:58	0:00:05
5/8/2009 13:55	0:00:16
5/11/2009 16:29	0:01:08
5/7/2009 13:52	0:00:24
5/7/2009 11:07	0:00:25
5/7/2009 13:54	0:00:07
5/8/2009 15:28	--:--:--
5/11/2009 15:27	0:00:36
5/8/2009 13:00	0:00:08
7/15/2009 22:16	0:00:30
7/15/2009 22:17	0:00:06
7/15/2009 22:17	0:00:04
11/5/2009 14:30	0:00:01
11/5/2009 14:30	--:--:--

Dialed Calls

5/11/2009 16:02	0:00:00
5/11/2009 16:02	0:00:04
7/15/2009 22:19	0:00:21
7/15/2009 22:19	0:00:20
7/15/2009 22:17	0:00:39
11/1/2009 14:30	0:00:03
11/1/2009 17:43	0:00:15
11/1/2009 17:45	0:00:02
11/1/2009 17:45	0:00:02
11/1/2009 17:44	0:00:28
11/1/2009 17:44	0:00:06
11/2/2009 8:47	0:00:25
11/3/2009 16:00	--:--:--

Information redacted in this document are pursuant to FOIA Exemption (b)(6)

Detailed Client Report

Period: 01/01/08 - 11/24/10

Client: 254675
City: managua
Phone: 5056342154

Timo Miller
State: Managua
Agent: 12

Address:

ZIP: none
Reseller: 0

Date	Hour	Origin No.	Destin. No.	Country	Minutes	Amount
04/06/09	01:39:04 PM	9888798	(b) (6)	Liberia Proper	0.00	\$0.0000
04/06/09	01:39:04 PM	9888798	(b) (6)	Liberia Proper	0.00	\$0.0000
04/06/09	01:39:04 PM	9888798	(b) (6)	Liberia Proper	0.00	\$0.0000
04/06/09	01:39:33 PM	9888798	(b) (6)	Liberia Proper	0.00	\$0.0000
04/06/09	01:39:33 PM	9888798	(b) (6)	Liberia Proper	0.00	\$0.0000
04/06/09	01:39:33 PM	9888798	(b) (6)	Liberia Proper	0.00	\$0.0000
04/06/09	01:53:13 PM	9888798	(b) (6)	USA MI Michigan	13.00	\$0.1950
04/06/09	02:00:38 PM	9888798	(b) (6)	Canada AB Alberta 403	1.00	\$0.0165
04/06/09	02:01:17 PM	9888798	(b) (6)	Canada AB Alberta 403	0.00	\$0.0000
04/06/09	02:17:31 PM	9888798	(b) (6)	Canada BC British Columbia 250	0.00	\$0.0000
04/06/09	02:33:05 PM	9888798	(b) (6)	Canada AB Alberta 403	1.00	\$0.0165
04/06/09	02:34:04 PM	9888798	(b) (6)	Canada AB Alberta 403	0.00	\$0.0000
04/06/09	02:34:54 PM	9888798	(b) (6)	Canada AB Alberta 403	1.00	\$0.0165
04/06/09	02:57:17 PM	9888798	(b) (6)	Canada AB Alberta 403	1.00	\$0.0165
04/06/09	03:00:47 PM	9888798	1250	Canada BC British Columbia 250	0.00	\$0.0000
04/06/09	03:00:47 PM	9888798	1250	Canada BC British Columbia 250	0.00	\$0.0000
04/06/09	03:00:47 PM	9888798	1250	Canada BC British Columbia 250	0.00	\$0.0000
04/06/09	03:03:10 PM	9888798	(b) (6)	Canada BC British Columbia 250	0.00	\$0.0000
04/06/09	09:34:05 PM	9888798	(b) (6)	Canada BC British Columbia 250	0.00	\$0.0000
04/06/09	09:34:39 PM	9888798	1403	Canada AB Alberta 403	0.00	\$0.0000
04/06/09	09:34:39 PM	9888798	1403	Canada AB Alberta 403	0.00	\$0.0000
04/06/09	09:34:39 PM	9888798	1403	Canada AB Alberta 403	0.00	\$0.0000
04/06/09	09:36:12 PM	9888798	(b) (6)	Canada AB Alberta 403	1.00	\$0.0165
04/06/09	11:50:43 PM	9888798	(b) (6)	Canada BC British Columbia 250	0.00	\$0.0000
04/07/09	12:31:15 AM	9888798	(b) (6)	Canada BC British Columbia 250	0.00	\$0.0000
04/07/09	09:57:46 AM	9888798	(b) (6)	Canada BC British Columbia 250	0.00	\$0.0000
04/07/09	09:59:50 AM	9888798	(b) (6)	Canada AB Alberta 403	1.00	\$0.0165
04/10/09	09:28:24 AM	9888798	(b) (6)	Canada BC British Columbia 250	0.00	\$0.0000
04/10/09	09:29:12 AM	9888798	(b) (6)	Canada BC British Columbia 250	0.00	\$0.0000
04/11/09	10:39:53 AM	9888798	(b) (6)	Canada BC British Columbia 250	11.00	\$0.1815
04/11/09	12:42:09 PM	9888798	(b) (6)	Canada BC British Columbia 250	0.00	\$0.0000
04/11/09	12:43:02 PM	9888798	(b) (6)	Canada BC British Columbia 250	0.00	\$0.0000
04/11/09	12:44:29 PM	9888798	(b) (6)	Canada BC British Columbia 250	0.00	\$0.0000
04/11/09	12:54:19 PM	9888798	(b) (6)	Canada AB Alberta 403	5.00	\$0.0825
04/13/09	08:32:21 AM	9888798	(b) (6)	USA MI Michigan	38.00	\$0.5700
04/13/09	09:59:32 AM	9888798	(b) (6)	USA MI Michigan	72.00	\$1.0800

Information redacted in this document are pursuant to FOIA Exemption (b)(6)

					Period: 01/01/08 - 11/24/10	
04/13/09	03:46:32 PM	9888798	[REDACTED]	Canada BC British Columbia 250	0.00	\$0.0000
04/13/09	09:08:51 PM	9888798	[REDACTED]	USA MI Michigan	2.00	\$0.0300
04/14/09	05:21:49 PM	9888798	[REDACTED]	USA OH Ohio	0.00	\$0.0000
04/14/09	05:22:55 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
04/14/09	05:35:11 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
04/14/09	06:30:14 PM	9888798	[REDACTED]	USA OH Ohio	55.00	\$0.8250
04/14/09	06:33:09 PM	9888798	[REDACTED]	Canada AB Alberta 403	1.00	\$0.0165
04/14/09	06:33:59 PM	9888798	[REDACTED]	Canada AB Alberta 403	1.00	\$0.0165
04/14/09	09:50:39 PM	9888798	[REDACTED]	USA TN Tennessee	1.00	\$0.0150
04/14/09	10:09:12 PM	9888798	[REDACTED]	USA TN Tennessee	18.00	\$0.2700
04/14/09	10:51:48 PM	9888798	[REDACTED]	USA CA California	42.00	\$0.6300
04/14/09	11:18:56 PM	9888798	1403	Canada AB Alberta 403	0.00	\$0.0000
04/14/09	11:18:56 PM	9888798	1403	Canada AB Alberta 403	0.00	\$0.0000
04/14/09	11:18:58 PM	9888798	[REDACTED]	Canada AB Alberta 403	0.00	\$0.0000
04/14/09	11:23:39 PM	9888798	[REDACTED]	Canada AB Alberta 403	1.00	\$0.0165
04/14/09	11:23:54 PM	9888798	[REDACTED]	Canada AB Alberta 403	0.00	\$0.0000
04/14/09	11:24:05 PM	9888798	[REDACTED]	Canada AB Alberta 403	1.00	\$0.0165
04/14/09	11:25:28 PM	9888798	[REDACTED]	Canada AB Alberta 403	1.00	\$0.0165
04/14/09	11:25:53 PM	9888798	[REDACTED]	Canada AB Alberta 403	1.00	\$0.0165
04/14/09	11:46:24 PM	9888798	[REDACTED]	Canada AB Alberta 403	12.00	\$0.1980
04/16/09	12:57:16 PM	9888798	[REDACTED]	USA TX Texas	62.00	\$0.9300
04/16/09	01:11:44 PM	9888798	[REDACTED]	Liberia Proper	0.00	\$0.0000
04/16/09	01:11:44 PM	9888798	[REDACTED]	Liberia Proper	0.00	\$0.0000
04/16/09	01:11:44 PM	9888798	[REDACTED]	Liberia Proper	0.00	\$0.0000
04/16/09	01:19:17 PM	9888798	[REDACTED]	USA MI Michigan	7.00	\$0.1050
04/20/09	01:45:34 AM	9888798	[REDACTED]	Canada BC British Columbia 250	108.00	\$1.7820
04/20/09	12:26:43 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
04/20/09	01:24:43 PM	9888798	[REDACTED]	USA NM New Mexico	36.00	\$0.5400
04/20/09	03:18:45 PM	9888798	[REDACTED]	USA OH Ohio	35.00	\$0.5250
04/20/09	03:36:23 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
04/20/09	03:37:22 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
04/20/09	03:38:41 PM	9888798	[REDACTED]	Canada AB Alberta 403	1.00	\$0.0165
04/20/09	03:38:56 PM	9888798	[REDACTED]	Canada AB Alberta 403	0.00	\$0.0000
04/20/09	03:39:04 PM	9888798	[REDACTED]	Canada AB Alberta 403	1.00	\$0.0165
04/20/09	03:39:45 PM	9888798	[REDACTED]	Canada AB Alberta 403	1.00	\$0.0165
04/20/09	04:09:42 PM	9888798	[REDACTED]	Canada AB Alberta 403	1.00	\$0.0165
04/20/09	04:10:32 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
04/20/09	04:11:32 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
04/20/09	05:02:03 PM	9888798	[REDACTED]	USA OH Ohio	37.00	\$0.5550
04/20/09	05:24:40 PM	9888798	[REDACTED]	USA MI Michigan	5.00	\$0.0750
04/20/09	08:43:42 PM	9888798	[REDACTED]	USA MI Michigan	12.00	\$0.1800

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04/20/09	08:52:04 PM	9888798	[REDACTED]	USA MI Michigan	4.00	\$0.0600
04/24/09	09:53:09 PM	9888798	[REDACTED]	USA MI Michigan	3.00	\$0.0450
05/12/09	12:01:45 AM	9888798	505	Nicaragua Proper	0.00	\$0.0000
05/12/09	12:01:46 AM	9888798	505	Nicaragua Proper	0.00	\$0.0000
05/12/09	12:01:46 AM	9888798	[REDACTED]	Nicaragua Proper	0.00	\$0.0000
05/12/09	08:40:22 AM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
05/12/09	08:41:36 AM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
05/12/09	08:42:26 AM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
05/12/09	08:48:42 AM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
05/12/09	08:51:00 AM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
05/12/09	05:07:39 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
05/12/09	07:00:50 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
05/12/09	07:01:55 PM	9888798	12	United States/Canada	0.00	\$0.0000
05/12/09	07:01:55 PM	9888798	12	United States/Canada	0.00	\$0.0000
05/12/09	07:01:55 PM	9888798	12	United States/Canada	0.00	\$0.0000
05/12/09	08:17:32 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
05/13/09	08:49:41 AM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
05/13/09	09:20:30 AM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
05/13/09	11:54:26 AM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
05/14/09	12:09:44 AM	9888798	[REDACTED]	USA NM New Mexico	0.00	\$0.0000
05/14/09	12:10:11 AM	9888798	[REDACTED]	USA NM New Mexico	0.00	\$0.0000
05/14/09	12:11:48 AM	9888798	[REDACTED]	Nicaragua Mobile - Bell South	1.00	\$0.2310
05/14/09	12:13:14 AM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
05/14/09	12:16:09 AM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
05/14/09	12:17:13 AM	9888798	[REDACTED]	Nicaragua - Managua	0.00	\$0.0000
05/14/09	02:49:16 AM	9888798	[REDACTED]	Nicaragua - Managua	0.00	\$0.0000
05/14/09	02:50:14 AM	9888798	[REDACTED]	Nicaragua - Managua	1.00	\$0.1650
05/14/09	02:50:51 AM	9888798	[REDACTED]	Nicaragua - Managua	1.00	\$0.1650
05/14/09	02:52:13 AM	9888798	[REDACTED]	Nicaragua - Managua	1.00	\$0.1650
05/14/09	02:53:02 AM	9888798	1330	USA OH Ohio	0.00	\$0.0000
05/14/09	02:53:12 AM	9888798	1330	USA OH Ohio	0.00	\$0.0000
05/14/09	02:54:27 AM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
05/14/09	02:55:23 AM	9888798	[REDACTED]	USA OH Ohio	0.00	\$0.0000
05/14/09	02:56:05 AM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
05/14/09	07:34:48 AM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
05/14/09	07:35:46 AM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
05/14/09	08:23:51 AM	9888798	[REDACTED]	USA OH Ohio	32.00	\$0.4800
05/14/09	09:10:01 AM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
05/14/09	10:14:18 AM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
05/14/09	10:17:46 AM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
05/14/09	10:20:22 AM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150

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05/14/09	11:26:47 AM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
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Information redacted in this document are pursuant to FOIA Exemption (b)(6)

05/14/09	11:28:07 AM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
05/14/09	11:32:45 AM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
05/14/09	11:34:24 AM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
05/14/09	06:47:13 PM	9888798	[REDACTED]	USA MI Michigan	29.00	\$0.4350
05/14/09	10:41:14 PM	9888798	[REDACTED]	USA OH Ohio	120.00	\$1.8000
05/14/09	10:49:03 PM	9888798	[REDACTED]	USA OH Ohio	8.00	\$0.1200
05/15/09	10:07:41 AM	9888798	[REDACTED]	USA TX Texas	0.00	\$0.0000
05/15/09	10:35:26 AM	9888798	[REDACTED]	USA TX Texas	28.00	\$0.4200
05/15/09	11:50:01 AM	9888798	[REDACTED]	USA OH Ohio	3.00	\$0.0450
05/15/09	11:51:40 AM	9888798	[REDACTED]	USA TN Tennessee	1.00	\$0.0150
05/15/09	12:43:24 PM	9888798	[REDACTED]	USA TN Tennessee	0.00	\$0.0000
05/15/09	01:11:05 PM	9888798	[REDACTED]	USA OH Ohio	24.00	\$0.3600
05/15/09	01:14:53 PM	9888798	[REDACTED]	Canada AB Alberta 403	1.00	\$0.0150
05/15/09	01:15:31 PM	9888798	[REDACTED]	Canada AB Alberta 403	1.00	\$0.0150
05/15/09	01:17:02 PM	9888798	[REDACTED]	Canada AB Alberta 403	1.00	\$0.0150
05/15/09	01:19:09 PM	9888798	[REDACTED]	Canada AB Alberta 403	2.00	\$0.0300
05/15/09	01:49:02 PM	9888798	[REDACTED]	Canada AB Alberta 403	1.00	\$0.0150
05/15/09	01:53:45 PM	9888798	[REDACTED]	Canada AB Alberta 403	2.00	\$0.0300
05/15/09	01:54:28 PM	9888798	[REDACTED]	Canada AB Alberta 403	0.00	\$0.0000
05/15/09	08:22:37 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
05/15/09	08:26:56 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
05/15/09	08:31:39 PM	9888798	[REDACTED]	Nicaragua Mobile - Bell South	3.00	\$0.6930
05/15/09	08:33:40 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
05/15/09	08:35:28 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
05/15/09	08:36:55 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
05/15/09	11:53:14 PM	9888798	[REDACTED]	Canada BC British Columbia 250	7.00	\$0.1050
05/16/09	08:15:42 AM	9888798	[REDACTED]	USA MI Michigan	3.00	\$0.0450
05/16/09	09:35:48 AM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
05/17/09	10:41:55 PM	9888798	[REDACTED]	Nicaragua Mobile - Bell South	2.00	\$0.4620
05/18/09	09:00:52 AM	9888798	[REDACTED]	USA TX Texas	20.00	\$0.3000
05/18/09	09:18:04 PM	9888798	[REDACTED]	Nicaragua Mobile - Bell South	1.00	\$0.2310
05/19/09	05:14:35 PM	9888798	[REDACTED]	USA OH Ohio	3.00	\$0.0450
05/20/09	09:01:51 AM	9888798	[REDACTED]	Nicaragua - Mobile - Claro	4.00	\$1.1000
06/28/09	10:08:33 PM	9888798	[REDACTED]	USA MI Michigan	2.00	\$0.0300
06/29/09	02:07:30 PM	9888798	[REDACTED]	USA OH Ohio	0.00	\$0.0000
06/29/09	02:08:46 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
06/30/09	10:30:51 AM	9888798	[REDACTED]	USA IN Indiana	1.00	\$0.0150
06/30/09	10:31:06 AM	9888798	[REDACTED]	USA IN Indiana	0.00	\$0.0000
06/30/09	10:31:13 AM	9888798	[REDACTED]	USA IN Indiana	0.00	\$0.0000
06/30/09	10:32:39 AM	9888798	[REDACTED]	USA IN Indiana	2.00	\$0.0300

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06/30/09	12:23:50 PM	9888798	[REDACTED]	USA IN Indiana	27.00	\$0.4050
06/30/09	12:32:07 PM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000

Information redacted in this document are pursuant to FOIA Exemption (b)(6)

06/30/09	12:32:33 PM	9888798		USA MI Michigan	0.00	\$0.0000
06/30/09	12:33:02 PM	9888798		USA MI Michigan	0.00	\$0.0000
06/30/09	12:33:25 PM	9888798		USA MI Michigan	0.00	\$0.0000
06/30/09	01:08:10 PM	9888798		USA MI Michigan	0.00	\$0.0000
06/30/09	01:09:49 PM	9888798		USA MI Michigan	1.00	\$0.0150
06/30/09	01:20:00 PM	9888798		USA MI Michigan	10.00	\$0.1500
06/30/09	08:33:44 PM	9888798		USA OH Ohio	1.00	\$0.0150
06/30/09	08:36:43 PM	9888798		USA OH Ohio	3.00	\$0.0450
07/01/09	01:32:07 PM	9888798		USA MI Michigan	10.00	\$0.1500
07/01/09	08:16:13 PM	9888798		USA OH Ohio	5.00	\$0.0750
07/02/09	06:22:08 PM	9888798		USA OH Ohio	7.00	\$0.1050
07/03/09	03:15:44 AM	9888798	1231	USA MI Michigan	0.00	\$0.0000
07/03/09	03:15:49 AM	9888798	1231	USA MI Michigan	0.00	\$0.0000
07/04/09	10:57:29 AM	9888798		USA OH Ohio	1.00	\$0.0150
07/04/09	10:57:51 AM	9888798		USA OH Ohio	1.00	\$0.0150
07/04/09	11:02:38 AM	9888798		USA OH Ohio	1.00	\$0.0150
07/04/09	11:03:18 AM	9888798		USA OH Ohio	1.00	\$0.0150
07/04/09	08:32:15 PM	9888798		USA MI Michigan	1.00	\$0.0150
07/04/09	08:33:20 PM	9888798		USA MI Michigan	1.00	\$0.0150
07/04/09	08:34:44 PM	9888798		USA MI Michigan	0.00	\$0.0000
07/05/09	04:03:51 AM	9888798		USA Toll Free US/Canada toll free	1.00	\$0.0150
07/05/09	06:03:51 PM	9888798		USA MI Michigan	1.00	\$0.0150
07/06/09	09:01:18 AM	9888798		USA OK Oklahoma	1.00	\$0.0150
07/06/09	09:01:28 AM	9888798		USA OK Oklahoma	0.00	\$0.0000
07/06/09	09:05:04 AM	9888798		USA OK Oklahoma	4.00	\$0.0600
07/06/09	04:03:47 PM	9888798		USA IN Indiana	3.00	\$0.0450
07/07/09	08:47:36 AM	9888798		USA MI Michigan	1.00	\$0.0150
07/07/09	09:34:05 AM	9888798		USA MI Michigan	46.00	\$0.6900
07/08/09	05:53:18 PM	9888798	51	Peru Proper	0.00	\$0.0000
07/08/09	05:53:18 PM	9888798	51	Peru Proper	0.00	\$0.0000
07/08/09	05:53:18 PM	9888798	51	Peru Proper	0.00	\$0.0000
07/08/09	05:53:19 PM	9888798	51	Peru Proper	0.00	\$0.0000
07/08/09	05:53:40 PM	9888798	212	Morocco Proper	0.00	\$0.0000
07/08/09	05:53:41 PM	9888798	212	Morocco Proper	0.00	\$0.0000
07/08/09	05:53:41 PM	9888798	212	Morocco Proper	0.00	\$0.0000
07/11/09	01:21:24 PM	9888798		USA MI Michigan	13.00	\$0.1950
07/12/09	08:19:13 PM	9888798		Canada BC British Columbia 250	32.00	\$0.4800
07/12/09	08:22:49 PM	9888798		Canada BC British Columbia 250	1.00	\$0.0150
07/13/09	05:11:43 PM	9888798		USA NM New Mexico	0.00	\$0.0000

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07/13/09	05:14:54 PM	9888798		USA NM New Mexico	4.00	\$0.0600
07/14/09	08:54:02 AM	9888798		USA OH Ohio	5.00	\$0.0750
07/14/09	09:01:29 AM	9888798		USA OH Ohio	1.00	\$0.0150

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07/14/09	09:02:07 AM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
07/14/09	09:09:29 AM	9888798	[REDACTED]	USA OH Ohio	7.00	\$0.1050
07/14/09	09:14:03 AM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
07/15/09	10:54:17 AM	9888798	[REDACTED]	USA OH Ohio	5.00	\$0.0750
07/16/09	11:13:22 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
07/16/09	11:13:47 PM	9888798	[REDACTED]	USA OH Ohio	0.00	\$0.0000
07/16/09	11:15:45 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
07/16/09	11:16:33 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
07/17/09	10:31:24 AM	9888798	[REDACTED]	USA OH Ohio	3.00	\$0.0450
07/19/09	09:16:46 AM	9888798	[REDACTED]	USA TN Tennessee	0.00	\$0.0000
07/19/09	09:17:09 AM	9888798	[REDACTED]	USA TN Tennessee	1.00	\$0.0150
07/19/09	09:58:10 AM	9888798	[REDACTED]	USA TN Tennessee	0.00	\$0.0000
07/19/09	09:58:52 AM	9888798	[REDACTED]	USA TN Tennessee	1.00	\$0.0150
07/19/09	09:59:06 AM	9888798	[REDACTED]	USA TN Tennessee	0.00	\$0.0000
07/19/09	09:59:47 AM	9888798	[REDACTED]	USA TN Tennessee	0.00	\$0.0000
07/19/09	10:00:07 AM	9888798	[REDACTED]	USA TN Tennessee	0.00	\$0.0000
07/19/09	10:00:41 AM	9888798	[REDACTED]	USA TN Tennessee	0.00	\$0.0000
07/19/09	10:00:53 AM	9888798	[REDACTED]	USA TN Tennessee	0.00	\$0.0000
07/19/09	10:14:33 AM	9888798	[REDACTED]	USA TN Tennessee	13.00	\$0.1950
07/19/09	07:36:39 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
07/19/09	07:38:16 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
07/19/09	10:42:34 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
07/20/09	09:17:39 AM	9888798	[REDACTED]	USA MI Michigan	5.00	\$0.0750
07/24/09	10:00:01 AM	9888798	[REDACTED]	USA OH Ohio	3.00	\$0.0450
07/24/09	10:11:34 AM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
07/24/09	10:17:10 AM	9888798	[REDACTED]	USA MI Michigan	6.00	\$0.0900
07/26/09	08:11:31 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
07/26/09	08:13:16 PM	9888798	[REDACTED]	IRAN (ISLAMIC REPUBLIC OF)	0.00	\$0.0000
07/26/09	08:14:09 PM	9888798	[REDACTED]	IRAN (ISLAMIC REPUBLIC OF)	0.00	\$0.0000
07/26/09	08:16:57 PM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
07/26/09	08:45:01 PM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
07/26/09	09:29:16 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
07/26/09	09:32:03 PM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
07/26/09	09:32:03 PM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
07/26/09	09:32:03 PM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
07/26/09	09:33:43 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
07/26/09	10:39:27 PM	9888798	[REDACTED]	USA SC South Carolina	5.00	\$0.0750
07/28/09	03:50:47 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150

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07/28/09	03:56:09 PM	9888798	[REDACTED]	USA OH Ohio	5.00	\$0.0750
07/31/09	11:33:05 AM	9888798	[REDACTED]	USA OH Ohio	3.00	\$0.0450
08/03/09	08:28:49 AM	9888798	[REDACTED]	USA MI Michigan	10.00	\$0.1500
08/14/09	12:12:37 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150

Information redacted in this document are pursuant to FOIA Exemption (b)(6)

08/14/09	03:27:04 PM	9888798		USA MI Michigan	1.00	\$0.0150
08/14/09	07:42:36 PM	9888798		USA MI Michigan	0.00	\$0.0000
08/14/09	07:43:12 PM	9888798		USA MI Michigan	0.00	\$0.0000
08/14/09	08:04:11 PM	9888798		USA MI Michigan	1.00	\$0.0150
08/14/09	08:26:48 PM	9888798		USA MI Michigan	1.00	\$0.0150
08/14/09	08:30:23 PM	9888798		USA MI Michigan	1.00	\$0.0150
08/16/09	07:30:06 PM	9888798		USA MI Michigan	1.00	\$0.0150
08/16/09	08:57:07 PM	9888798	123	USA / Canada	0.00	\$0.0000
08/16/09	08:57:07 PM	9888798	123	USA / Canada	0.00	\$0.0000
08/16/09	08:57:07 PM	9888798	123	USA / Canada	0.00	\$0.0000
08/16/09	08:57:07 PM	9888798	123	USA / Canada	0.00	\$0.0000
08/16/09	09:05:38 PM	9888798		USA MI Michigan	8.00	\$0.1200
08/17/09	03:15:18 PM	9888798		USA MI Michigan	23.00	\$0.3450
08/17/09	03:18:38 PM	9888798		Liberia - Lonestar Mobile	1.00	\$0.3397
08/17/09	03:19:41 PM	9888798		Liberia - Lonestar Mobile	1.00	\$0.3397
08/17/09	03:21:20 PM	9888798		USA MI Michigan	1.00	\$0.0150
08/17/09	03:24:07 PM	9888798		Liberia - Lonestar Mobile	0.00	\$0.0000
08/17/09	03:25:01 PM	9888798		Liberia - Lonestar Mobile	0.00	\$0.0000
08/17/09	03:26:38 PM	9888798		Liberia - Lonestar Mobile	0.00	\$0.0000
08/17/09	03:30:41 PM	9888798		USA MI Michigan	3.00	\$0.0450
08/17/09	03:35:18 PM	9888798		USA MI Michigan	1.00	\$0.0150
08/17/09	10:01:48 PM	9888798		USA OH Ohio	2.00	\$0.0300
08/17/09	10:13:41 PM	9888798		USA OH Ohio	12.00	\$0.1800
08/18/09	02:25:21 PM	9888798		USA MI Michigan	1.00	\$0.0150
08/18/09	02:27:59 PM	9888798	11231	USA / Canada	0.00	\$0.0000
08/18/09	02:27:59 PM	9888798	11231	USA / Canada	0.00	\$0.0000
08/18/09	02:27:59 PM	9888798	11231	USA / Canada	0.00	\$0.0000
08/18/09	02:27:59 PM	9888798		USA / Canada	0.00	\$0.0000
08/18/09	02:29:53 PM	9888798		USA MI Michigan	1.00	\$0.0150
08/18/09	08:04:35 PM	9888798		USA MI Michigan	1.00	\$0.0150
08/20/09	10:05:40 PM	9888798		Puerto Rico - Mobile	0.00	\$0.0000
08/20/09	10:06:14 PM	9888798	790	Russia Mobile - All Cities/Other Cities Mobile	0.00	\$0.0000
08/20/09	10:07:13 PM	9888798	790	Russia Mobile - All Cities/Other Cities Mobile	0.00	\$0.0000
08/20/09	10:07:14 PM	9888798	790	Russia Mobile - All Cities/Other Cities Mobile	0.00	\$0.0000
08/21/09	09:31:49 PM	9888798		Puerto Rico Puerto Rico	1.00	\$0.0200
08/21/09	09:35:00 PM	9888798	970	Palestinian Authority	0.00	\$0.0000
08/21/09	09:35:00 PM	9888798	970	Palestinian Authority	0.00	\$0.0000

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08/21/09	09:35:25 PM	9888798	970	Palestinian Authority	0.00	\$0.0000
08/22/09	10:09:44 PM	9888798		USA MI Michigan	5.00	\$0.0750
08/22/09	10:31:56 PM	9888798		USA MI Michigan	1.00	\$0.0150
08/23/09	08:11:48 PM	9888798		USA MI Michigan	0.00	\$0.0000
08/23/09	08:12:58 PM	9888798		USA MI Michigan	1.00	\$0.0150

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08/23/09	10:04:19 PM	9888798		USA MI Michigan	1.00	\$0.0150
08/23/09	11:11:08 PM	9888798		USA MI Michigan	2.00	\$0.0300
08/29/09	10:21:28 AM	9888798		USA MI Michigan	13.00	\$0.1950
08/30/09	03:38:15 PM	9888798		USA TN Tennessee	47.00	\$0.7050
08/30/09	03:43:26 PM	9888798		USA TN Tennessee	1.00	\$0.0150
08/30/09	11:30:02 PM	9888798	955	MYANMAR	0.00	\$0.0000
08/30/09	11:30:06 PM	9888798	955	MYANMAR	0.00	\$0.0000
08/30/09	11:30:38 PM	9888798	986	Iran - Khozestan	0.00	\$0.0000
08/30/09	11:31:03 PM	9888798	986	Iran - Khozestan	0.00	\$0.0000
08/31/09	09:43:19 AM	9888798		USA OH Ohio	1.00	\$0.0150
08/31/09	12:24:31 PM	9888798		USA OH Ohio	1.00	\$0.0150
08/31/09	12:25:15 PM	9888798		USA OH Ohio	0.00	\$0.0000
09/01/09	06:13:15 AM	9888798		USA MI Michigan	1.00	\$0.0150
09/01/09	06:26:40 AM	9888798		USA MI Michigan	3.00	\$0.0450
09/01/09	06:51:19 AM	9888798		USA MI Michigan	0.00	\$0.0000
09/01/09	06:53:53 AM	9888798		USA MI Michigan	2.00	\$0.0300
09/01/09	08:55:40 AM	9888798		USA PA Pennsylvania	2.00	\$0.0300
09/01/09	08:56:16 AM	9888798		USA FL Florida	0.00	\$0.0000
09/01/09	08:56:37 AM	9888798		USA FL Florida	0.00	\$0.0000
09/01/09	09:00:04 AM	9888798		USA - Toll Free	1.00	\$0.0150
09/01/09	09:09:55 AM	9888798		USA PA Pennsylvania	6.00	\$0.0900
09/01/09	09:22:16 AM	9888798		USA FL Florida	11.00	\$0.1650
09/01/09	09:30:06 AM	9888798		USA OR Oregon	1.00	\$0.0150
09/01/09	09:49:10 AM	9888798		USA OR Oregon	0.00	\$0.0000
09/01/09	12:10:11 PM	9888798		USA MI Michigan	1.00	\$0.0150
09/01/09	12:11:12 PM	9888798		USA MI Michigan	1.00	\$0.0150
09/01/09	12:12:01 PM	9888798		USA MI Michigan	1.00	\$0.0150
09/01/09	12:34:48 PM	9888798		USA MI Michigan	20.00	\$0.3000
09/01/09	12:47:42 PM	9888798		USA MI Michigan	8.00	\$0.1200
09/01/09	01:18:43 PM	9888798		USA MI Michigan	7.00	\$0.1050
09/01/09	02:06:03 PM	9888798		USA MI Michigan	1.00	\$0.0150
09/01/09	02:06:48 PM	9888798		USA MI Michigan	0.00	\$0.0000
09/01/09	02:30:14 PM	9888798		USA MI Michigan	1.00	\$0.0150
09/01/09	03:04:46 PM	9888798		USA MI Michigan	10.00	\$0.1500
09/02/09	10:30:24 AM	9888798		USA OH Ohio	3.00	\$0.0450
09/02/09	12:57:54 PM	9888798		USA NM New Mexico	45.00	\$0.6750

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09/02/09	07:13:09 PM	9888798		USA MI Michigan	13.00	\$0.1950
09/03/09	09:22:42 PM	9888798		Puerto Rico Puerto Rico	2.00	\$0.0400
09/03/09	10:33:10 PM	9888798		USA MI Michigan	0.00	\$0.0000
09/03/09	10:39:18 PM	9888798		IRAN (ISLAMIC REPUBLIC OF)	0.00	\$0.0000
09/03/09	10:39:32 PM	9888798		IRAN (ISLAMIC REPUBLIC OF)	0.00	\$0.0000
09/04/09	11:42:40 AM	9888798		USA MI Michigan	0.00	\$0.0000

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09/04/09	11:42:53 AM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
09/04/09	11:42:57 AM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
09/04/09	11:42:59 AM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
09/04/09	12:42:37 PM	9888798	[REDACTED]	USA MI Michigan	55.00	\$0.8250
09/04/09	02:08:11 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
09/04/09	02:09:06 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
09/04/09	02:23:12 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
09/04/09	02:29:54 PM	9888798	[REDACTED]	CHINA	0.00	\$0.0000
09/04/09	02:32:24 PM	9888798	[REDACTED]	CHINA	3.00	\$0.0528
09/04/09	02:42:01 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
09/07/09	06:20:54 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
09/07/09	06:21:51 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
09/07/09	06:23:45 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
09/07/09	06:24:48 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
09/07/09	06:51:37 PM	9888798	[REDACTED]	USA OH Ohio	0.00	\$0.0000
09/07/09	06:51:38 PM	9888798	[REDACTED]	USA OH Ohio	0.00	\$0.0000
09/07/09	06:52:03 PM	9888798	[REDACTED]	USA OH Ohio	0.00	\$0.0000
09/07/09	06:58:12 PM	9888798	[REDACTED]	USA OH Ohio	3.00	\$0.0450
09/07/09	07:10:42 PM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
09/07/09	07:11:46 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
09/08/09	02:39:16 PM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
09/08/09	02:39:54 PM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
09/08/09	02:40:45 PM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
09/08/09	05:19:30 PM	9888798	[REDACTED]	USA MI Michigan	32.00	\$0.4800
09/08/09	05:59:49 PM	9888798	[REDACTED]	USA MI Michigan	3.00	\$0.0450
09/08/09	06:36:11 PM	9888798	[REDACTED]	USA OH Ohio	12.00	\$0.1800
09/08/09	07:30:11 PM	9888798	[REDACTED]	USA TX Texas	1.00	\$0.0150
09/08/09	07:31:15 PM	9888798	[REDACTED]	USA TX Texas	1.00	\$0.0150
09/08/09	08:05:37 PM	9888798	[REDACTED]	USA TX Texas	1.00	\$0.0150
09/08/09	08:10:18 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
09/08/09	08:14:58 PM	9888798	[REDACTED]	USA MI Michigan	2.00	\$0.0300
09/09/09	03:34:35 PM	9888798	[REDACTED]	USA MI Michigan	61.00	\$0.9150
09/12/09	12:44:07 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
09/12/09	12:48:10 PM	9888798	[REDACTED]	USA OH Ohio	4.00	\$0.0600
09/12/09	07:15:58 PM	9888798	[REDACTED]	USA IL Illinois	4.00	\$0.0600

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09/12/09	09:16:15 PM	9888798	[REDACTED]	USA MI Michigan	9.00	\$0.1350
09/12/09	09:19:16 PM	9888798	[REDACTED]	Puerto Rico Puerto Rico	1.00	\$0.0200
09/15/09	08:25:06 AM	9888798	[REDACTED]	USA OH Ohio	2.00	\$0.0300
09/15/09	11:58:12 AM	9888798	[REDACTED]	USA Toll Free US/Canada toll free	4.00	\$0.0600
09/15/09	11:59:46 AM	9888798	[REDACTED]	USA NM New Mexico	2.00	\$0.0300
09/15/09	12:01:19 PM	9888798	[REDACTED]	USA NM New Mexico	2.00	\$0.0300
09/15/09	12:02:21 PM	9888798	1505	USA NM New Mexico	0.00	\$0.0000

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09/15/09	12:03:45 PM	9888798		USA NM New Mexico	1.00	\$0.0150
09/15/09	12:08:53 PM	9888798		USA MI Michigan	2.00	\$0.0300
09/16/09	09:34:01 AM	9888798		USA OH Ohio	2.00	\$0.0300
09/17/09	08:25:04 AM	9888798		USA NM New Mexico	10.00	\$0.1500
09/17/09	08:41:10 AM	9888798		USA NM New Mexico	16.00	\$0.2400
09/17/09	08:46:30 AM	9888798		USA MI Michigan	5.00	\$0.0750
09/18/09	10:08:53 PM	9888798		USA OH Ohio	2.00	\$0.0300
09/19/09	10:00:47 AM	9888798		USA OH Ohio	1.00	\$0.0150
09/19/09	10:02:55 AM	9888798		USA OH Ohio	2.00	\$0.0300
09/19/09	10:09:59 AM	9888798		USA OH Ohio	1.00	\$0.0150
09/19/09	02:06:21 PM	9888798		Canada BC British Columbia 250	23.00	\$0.3450
09/19/09	02:42:00 PM	9888798		Canada BC British Columbia 250	14.00	\$0.2100
09/21/09	02:07:14 PM	9888798		USA MI Michigan	1.00	\$0.0150
09/21/09	02:07:44 PM	9888798		USA MI Michigan	1.00	\$0.0150
09/21/09	02:09:06 PM	9888798		USA MI Michigan	1.00	\$0.0150
09/21/09	02:14:55 PM	9888798		USA MI Michigan	1.00	\$0.0150
09/21/09	02:16:13 PM	9888798		USA MI Michigan	1.00	\$0.0150
09/21/09	02:20:29 PM	9888798		USA MI Michigan	4.00	\$0.0600
09/21/09	02:53:55 PM	9888798		USA VA Virginia	1.00	\$0.0150
09/21/09	04:01:03 PM	9888798		USA VA Virginia	7.00	\$0.1050
09/21/09	05:33:22 PM	9888798		USA - Toll Free	41.00	\$0.6150
09/21/09	05:57:14 PM	9888798		USA - Toll Free	5.00	\$0.0750
09/21/09	06:03:48 PM	9888798		USA VA Virginia	6.00	\$0.0900
09/21/09	10:10:25 PM	9888798	970	Palestinian Authority	0.00	\$0.0000
09/21/09	10:10:25 PM	9888798	970	Palestinian Authority	0.00	\$0.0000
09/21/09	10:10:28 PM	9888798	970	Palestinian Authority	0.00	\$0.0000
09/21/09	10:11:21 PM	9888798		USA ND North Dakota	0.00	\$0.0000
09/21/09	10:11:21 PM	9888798		USA ND North Dakota	0.00	\$0.0000
09/21/09	10:11:23 PM	9888798		USA ND North Dakota	0.00	\$0.0000
09/21/09	10:11:23 PM	9888798		USA ND North Dakota	0.00	\$0.0000
09/21/09	10:11:23 PM	9888798		USA ND North Dakota	0.00	\$0.0000
09/21/09	10:11:23 PM	9888798		USA ND North Dakota	0.00	\$0.0000
09/21/09	10:11:24 PM	9888798		USA ND North Dakota	0.00	\$0.0000
09/21/09	10:11:24 PM	9888798		USA ND North Dakota	0.00	\$0.0000
09/21/09	10:12:11 PM	9888798		USA ND North Dakota	0.00	\$0.0000

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09/21/09	10:12:12 PM	9888798		USA ND North Dakota	0.00	\$0.0000
09/21/09	10:12:14 PM	9888798		USA ND North Dakota	0.00	\$0.0000
09/21/09	10:12:14 PM	9888798		USA ND North Dakota	0.00	\$0.0000
09/21/09	10:12:14 PM	9888798		USA ND North Dakota	0.00	\$0.0000
09/21/09	10:12:14 PM	9888798		USA ND North Dakota	0.00	\$0.0000
09/21/09	10:12:14 PM	9888798		USA ND North Dakota	0.00	\$0.0000
09/22/09	09:42:22 AM	9888798		USA VA Virginia	1.00	\$0.0150
09/22/09	10:15:55 AM	9888798		USA VA Virginia	33.00	\$0.4950

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09/22/09	12:47:17 PM	9888798		USA MI Michigan	1.00	\$0.0150
09/22/09	12:59:30 PM	9888798		USA MI Michigan	12.00	\$0.1800
09/22/09	01:08:58 PM	9888798		USA VA Virginia	1.00	\$0.0150
09/22/09	01:12:39 PM	9888798		USA VA Virginia	4.00	\$0.0600
09/22/09	01:47:59 PM	9888798		USA OH Ohio	9.00	\$0.1350
09/22/09	02:16:59 PM	9888798		USA VA Virginia	16.00	\$0.2400
09/22/09	10:57:16 PM	9888798		USA VA Virginia	10.00	\$0.1500
09/22/09	11:18:22 PM	9888798		USA VA Virginia	6.00	\$0.0900
09/22/09	11:38:28 PM	9888798		USA KS Kansas	1.00	\$0.0150
09/22/09	11:39:01 PM	9888798		USA KS Kansas	1.00	\$0.0150
09/22/09	11:39:31 PM	9888798		USA KS Kansas	1.00	\$0.0150
09/22/09	11:40:15 PM	9888798		USA KS Kansas	1.00	\$0.0150
09/22/09	11:41:23 PM	9888798		USA KS Kansas	1.00	\$0.0150
09/22/09	11:41:55 PM	9888798		USA KS Kansas	1.00	\$0.0150
09/22/09	11:42:35 PM	9888798		USA KS Kansas	1.00	\$0.0150
09/22/09	11:59:49 PM	9888798		USA KS Kansas	10.00	\$0.1500
09/23/09	12:14:25 AM	9888798		USA VA Virginia	4.00	\$0.0600
09/23/09	09:58:14 AM	9888798		USA OH Ohio	7.00	\$0.1050
09/23/09	09:59:36 AM	9888798		USA OH Ohio	1.00	\$0.0150
09/23/09	01:30:38 PM	9888798		ARGENTINA	0.00	\$0.0000
09/23/09	01:30:38 PM	9888798		ARGENTINA	0.00	\$0.0000
09/23/09	01:30:41 PM	9888798		ARGENTINA	0.00	\$0.0000
09/23/09	01:30:42 PM	9888798		ARGENTINA	0.00	\$0.0000
09/23/09	01:31:02 PM	9888798		ARGENTINA	0.00	\$0.0000
09/23/09	01:31:24 PM	9888798		ARGENTINA	0.00	\$0.0000
09/23/09	01:31:25 PM	9888798		ARGENTINA	0.00	\$0.0000
09/23/09	01:31:28 PM	9888798		ARGENTINA	0.00	\$0.0000
09/23/09	01:31:28 PM	9888798		ARGENTINA	0.00	\$0.0000
09/23/09	01:32:22 PM	9888798		ARGENTINA	0.00	\$0.0000
09/23/09	01:32:33 PM	9888798	5406	ARGENTINA	0.00	\$0.0000
09/23/09	01:32:34 PM	9888798	5406	ARGENTINA	0.00	\$0.0000
09/23/09	01:32:37 PM	9888798	5406	ARGENTINA	0.00	\$0.0000
09/23/09	01:32:37 PM	9888798	5406	ARGENTINA	0.00	\$0.0000

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09/23/09	01:33:06 PM	9888798	5406	ARGENTINA	0.00	\$0.0000
09/23/09	01:33:42 PM	9888798		USA VA Virginia	0.00	\$0.0000
09/23/09	01:35:23 PM	9888798		USA VA Virginia	2.00	\$0.0300
09/23/09	06:29:29 PM	9888798		ARGENTINA	0.00	\$0.0000
09/23/09	06:29:29 PM	9888798		ARGENTINA	0.00	\$0.0000
09/23/09	06:29:32 PM	9888798		ARGENTINA	0.00	\$0.0000
09/23/09	06:29:38 PM	9888798		ARGENTINA	0.00	\$0.0000
09/23/09	06:30:11 PM	9888798		ARGENTINA	0.00	\$0.0000
09/23/09	06:30:43 PM	9888798		USA VA Virginia	1.00	\$0.0150

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09/23/09	06:31:18 PM	9888798		USA VA Virginia	1.00	\$0.0150
09/24/09	11:28:37 AM	9888798		USA MI Michigan	12.00	\$0.1800
09/24/09	03:09:25 PM	9888798		USA OH Ohio	3.00	\$0.0450
09/24/09	03:12:29 PM	9888798		USA OH Ohio	3.00	\$0.0450
09/24/09	03:35:33 PM	9888798		USA OH Ohio	4.00	\$0.0600
09/24/09	03:53:08 PM	9888798		USA OH Ohio	2.00	\$0.0300
09/24/09	04:22:23 PM	9888798		USA MI Michigan	5.00	\$0.0750
09/25/09	12:49:55 PM	9888798		USA MI Michigan	1.00	\$0.0150
09/25/09	06:08:41 PM	9888798		USA MI Michigan	1.00	\$0.0150
09/25/09	06:12:52 PM	9888798		USA MI Michigan	4.00	\$0.0600
09/25/09	07:35:32 PM	9888798		USA OH Ohio	8.00	\$0.1200
09/27/09	08:57:36 AM	9888798		USA VA Virginia	12.00	\$0.1800
09/27/09	10:45:00 AM	9888798		USA OH Ohio	0.00	\$0.0000
09/27/09	10:46:41 AM	9888798		USA OH Ohio	2.00	\$0.0300
09/30/09	11:03:52 AM	9888798		USA OH Ohio	3.00	\$0.0450
09/30/09	12:41:16 PM	9888798		USA MI Michigan	6.00	\$0.0900
09/30/09	03:18:06 PM	9888798		USA Toll Free US/Canada toll free	7.00	\$0.2450
10/01/09	04:50:22 PM	9888798		USA Toll Free US/Canada toll free	17.00	\$0.5950
10/01/09	05:49:22 PM	9888798		USA NM New Mexico	0.00	\$0.0000
10/01/09	05:52:05 PM	9888798		USA NM New Mexico	2.00	\$0.0300
10/01/09	05:52:25 PM	9888798		USA NM New Mexico	0.00	\$0.0000
10/01/09	05:52:26 PM	9888798		USA NM New Mexico	0.00	\$0.0000
10/01/09	05:56:43 PM	9888798		USA NM New Mexico	5.00	\$0.0750
10/01/09	05:57:35 PM	9888798		USA NM New Mexico	1.00	\$0.0150
10/01/09	05:59:58 PM	9888798		USA NM New Mexico	2.00	\$0.0300
10/02/09	02:04:42 PM	9888798		USA NM New Mexico	31.00	\$0.4650
10/02/09	02:09:01 PM	9888798		USA NM New Mexico	0.00	\$0.0000
10/02/09	02:09:28 PM	9888798		USA NM New Mexico	0.00	\$0.0000
10/02/09	02:13:33 PM	9888798		USA NM New Mexico	4.00	\$0.0600
10/03/09	12:13:18 PM	9888798		USA CA California	1.00	\$0.0150
10/03/09	01:02:19 PM	9888798		USA CA California	49.00	\$0.7350
10/05/09	03:31:55 PM	9888798		USA NM New Mexico	0.00	\$0.0000

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10/05/09	04:40:51 PM	9888798		USA NM New Mexico	69.00	\$1.0350
10/06/09	07:36:59 PM	9888798		USA NM New Mexico	65.00	\$0.9750
10/07/09	04:57:43 PM	9888798		USA OH Ohio	0.00	\$0.0000
10/07/09	04:59:43 PM	9888798		USA OH Ohio	2.00	\$0.0300
10/08/09	06:08:11 PM	9888798		USA TX Texas	0.00	\$0.0000
10/08/09	06:08:44 PM	9888798		USA TX Texas	0.00	\$0.0000
10/08/09	06:09:37 PM	9888798		USA TX Texas	1.00	\$0.0150
10/08/09	06:16:21 PM	9888798		USA TX Texas	0.00	\$0.0000
10/08/09	06:29:52 PM	9888798		USA TX Texas	13.00	\$0.1950
10/10/09	01:10:25 PM	9888798		USA KS Kansas	1.00	\$0.0150

Information redacted in this document are pursuant to FOIA Exemption (b)(6)

10/10/09	01:11:55 PM	9888798	[REDACTED]	USA - Toll Free	1.00	\$0.0150
10/10/09	01:32:51 PM	9888798	[REDACTED]	USA KS Kansas	6.00	\$0.0900
10/10/09	06:51:53 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
10/10/09	06:52:39 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
10/10/09	06:53:26 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
10/10/09	06:54:14 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
10/11/09	03:50:35 PM	9888798	606	Malaysia Malacca	0.00	\$0.0000
10/11/09	03:50:36 PM	9888798	606	Malaysia Malacca	0.00	\$0.0000
10/11/09	03:50:46 PM	9888798	606	Malaysia Malacca	0.00	\$0.0000
10/11/09	03:51:11 PM	9888798	606	Malaysia Malacca	1.00	\$0.0220
10/11/09	03:51:51 PM	9888798	506	Costa Rica Proper	0.00	\$0.0000
10/11/09	03:51:51 PM	9888798	506	Costa Rica Proper	0.00	\$0.0000
10/11/09	03:51:51 PM	9888798	506	Costa Rica Proper	0.00	\$0.0000
10/11/09	03:51:51 PM	9888798	506	Costa Rica Proper	0.00	\$0.0000
10/11/09	03:52:31 PM	9888798	[REDACTED]	Costa Rica Proper	1.00	\$0.0660
10/11/09	08:37:37 PM	9888798	[REDACTED]	Costa Rica - San Jose	1.00	\$0.0660
10/11/09	10:00:13 PM	9888798	[REDACTED]	Costa Rica - San Jose	10.00	\$0.6600
10/12/09	10:51:41 AM	9888798	[REDACTED]	USA - Toll Free	5.00	\$0.0750
10/13/09	02:40:23 PM	9888798	[REDACTED]	USA KS Kansas	26.00	\$0.3900
10/13/09	04:39:48 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
10/14/09	10:26:47 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
10/14/09	10:29:00 PM	9888798	[REDACTED]	USA OH Ohio	2.00	\$0.0300
10/16/09	09:12:52 AM	9888798	[REDACTED]	Puerto Rico Puerto Rico	1.00	\$0.0150
10/16/09	09:17:04 AM	9888798	[REDACTED]	Puerto Rico - Mobile	3.00	\$0.0450
10/16/09	04:05:16 PM	9888798	[REDACTED]	USA MI Michigan	3.00	\$0.0450
10/19/09	11:36:01 AM	9888798	[REDACTED]	USA VA Virginia	19.00	\$0.2850
10/19/09	01:06:45 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
10/19/09	03:11:38 PM	9888798	[REDACTED]	USA NM New Mexico	2.00	\$0.0300
10/19/09	03:27:11 PM	9888798	[REDACTED]	USA NM New Mexico	0.00	\$0.0000
10/19/09	03:45:13 PM	9888798	[REDACTED]	USA NM New Mexico	18.00	\$0.2700
10/19/09	03:51:04 PM	9888798	[REDACTED]	USA KY Kentucky	1.00	\$0.0150

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10/19/09	03:52:18 PM	9888798	[REDACTED]	USA KY Kentucky	1.00	\$0.0150
10/19/09	03:57:07 PM	9888798	[REDACTED]	USA KY Kentucky	1.00	\$0.0150
10/19/09	05:57:37 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
10/20/09	05:14:13 PM	9888798	[REDACTED]	Liberia Mobile - Other Carriers	0.00	\$0.0000
10/20/09	05:14:13 PM	9888798	[REDACTED]	Liberia Mobile - Other Carriers	0.00	\$0.0000
10/20/09	05:15:42 PM	9888798	[REDACTED]	Liberia Mobile - Other Carriers	1.00	\$0.3397
10/20/09	05:17:25 PM	9888798	[REDACTED]	Liberia Mobile - Other Carriers	0.00	\$0.0000
10/20/09	05:17:25 PM	9888798	[REDACTED]	Liberia Mobile - Other Carriers	0.00	\$0.0000
10/20/09	05:18:32 PM	9888798	[REDACTED]	Liberia Mobile - Other Carriers	1.00	\$0.3397
10/20/09	05:19:48 PM	9888798	[REDACTED]	Peru - Mobile/SS	0.00	\$0.0000
10/20/09	05:20:22 PM	9888798	[REDACTED]	Liberia Mobile - Other Carriers	0.00	\$0.0000

Information redacted in this document are pursuant to FOIA Exemption (b)(6)

10/20/09	05:20:22 PM	9888798	[REDACTED]	Liberia Mobile - Other Carriers	0.00	\$0.0000
10/20/09	05:21:06 PM	9888798	[REDACTED]	Liberia Mobile - Other Carriers	1.00	\$0.3397
10/20/09	06:44:01 PM	9888798	[REDACTED]	Liberia Mobile - Other Carriers	0.00	\$0.0000
10/20/09	06:44:01 PM	9888798	[REDACTED]	Liberia Mobile - Other Carriers	0.00	\$0.0000
10/20/09	06:45:11 PM	9888798	[REDACTED]	Liberia Mobile - Other Carriers	1.00	\$0.3397
10/22/09	10:04:57 AM	9888798	[REDACTED]	USA MI Michigan	12.00	\$0.1800
10/22/09	10:08:36 AM	9888798	[REDACTED]	USA OH Ohio	2.00	\$0.0300
10/23/09	11:44:43 AM	9888798	[REDACTED]	USA VA Virginia	10.00	\$0.1500
10/26/09	08:48:22 PM	9888798	1787	Puerto Rico Puerto Rico	0.00	\$0.0000
10/26/09	08:48:22 PM	9888798	1787	Puerto Rico Puerto Rico	0.00	\$0.0000
10/26/09	08:48:23 PM	9888798	1787	Puerto Rico Puerto Rico	0.00	\$0.0000
10/26/09	08:48:30 PM	9888798	1787	Puerto Rico Puerto Rico	0.00	\$0.0000
10/26/09	08:48:30 PM	9888798	1787	Puerto Rico Puerto Rico	0.00	\$0.0000
10/26/09	08:48:30 PM	9888798	1787	Puerto Rico Puerto Rico	0.00	\$0.0000
10/26/09	08:48:30 PM	9888798	1787	Puerto Rico Puerto Rico	0.00	\$0.0000
10/26/09	08:50:49 PM	9888798	[REDACTED]	Puerto Rico - Mobile	1.00	\$0.0150
10/28/09	09:13:10 AM	9888798	1540	USA VA Virginia	0.00	\$0.0000
10/28/09	09:14:37 AM	9888798	[REDACTED]	USA VA Virginia	1.00	\$0.0150
10/30/09	06:53:45 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
11/02/09	12:13:08 PM	9888798	[REDACTED]	USA MI Michigan	33.00	\$0.4950
11/02/09	12:26:43 PM	9888798	[REDACTED]	USA OH Ohio	2.00	\$0.0300
11/02/09	12:30:31 PM	9888798	[REDACTED]	USA OH Ohio	2.00	\$0.0300
11/02/09	01:43:11 PM	9888798	[REDACTED]	USA PA Pennsylvania	7.00	\$0.1050
11/02/09	02:24:49 PM	9888798	[REDACTED]	USA PA Pennsylvania	6.00	\$0.0900
11/02/09	03:02:24 PM	9888798	[REDACTED]	USA Toll Free US/Canada toll free	10.00	\$0.3500
11/03/09	02:10:16 PM	9888798	[REDACTED]	USA KS Kansas	0.00	\$0.0000
11/03/09	02:18:39 PM	9888798	[REDACTED]	USA KS Kansas	0.00	\$0.0000
11/03/09	02:36:58 PM	9888798	[REDACTED]	USA KS Kansas	19.00	\$0.2850
11/03/09	07:35:40 PM	9888798	[REDACTED]	USA OH Ohio	0.00	\$0.0000
11/03/09	07:37:07 PM	9888798	[REDACTED]	USA OH Ohio	2.00	\$0.0300

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11/04/09	09:45:09 AM	9888798	[REDACTED]	USA OH Ohio	0.00	\$0.0000
11/04/09	09:47:09 AM	9888798	[REDACTED]	USA OH Ohio	2.00	\$0.0300
11/04/09	10:31:32 AM	9888798	[REDACTED]	USA VA Virginia	0.00	\$0.0000
11/04/09	10:31:32 AM	9888798	[REDACTED]	USA VA Virginia	0.00	\$0.0000
11/04/09	10:32:27 AM	9888798	[REDACTED]	USA VA Virginia	1.00	\$0.0150
11/04/09	10:32:52 AM	9888798	[REDACTED]	USA VA Virginia	0.00	\$0.0000
11/04/09	10:32:53 AM	9888798	[REDACTED]	USA VA Virginia	0.00	\$0.0000
11/04/09	10:34:09 AM	9888798	[REDACTED]	USA VA Virginia	1.00	\$0.0150
11/04/09	11:02:18 AM	9888798	[REDACTED]	USA VA Virginia	0.00	\$0.0000
11/04/09	11:02:18 AM	9888798	[REDACTED]	USA VA Virginia	0.00	\$0.0000
11/04/09	11:13:18 AM	9888798	[REDACTED]	USA VA Virginia	11.00	\$0.1650
11/05/09	07:46:49 AM	9888798	1231	USA MI Michigan	0.00	\$0.0000

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11/05/09	07:46:49 AM	9888798	1231	USA MI Michigan	0.00	\$0.0000
11/05/09	07:46:51 AM	9888798	1231	USA MI Michigan	0.00	\$0.0000
11/05/09	07:46:51 AM	9888798	1231	USA MI Michigan	0.00	\$0.0000
11/05/09	07:46:51 AM	9888798	1231	USA MI Michigan	0.00	\$0.0000
11/05/09	07:46:51 AM	9888798	1231	USA MI Michigan	0.00	\$0.0000
11/05/09	07:46:51 AM	9888798		USA MI Michigan	0.00	\$0.0000
11/05/09	07:48:02 AM	9888798		USA MI Michigan	0.00	\$0.0000
11/05/09	07:48:16 AM	9888798		USA MI Michigan	0.00	\$0.0000
11/05/09	07:48:59 AM	9888798		USA MI Michigan	1.00	\$0.0150
11/05/09	07:49:10 AM	9888798		USA MI Michigan	0.00	\$0.0000
11/05/09	07:49:54 AM	9888798		USA MI Michigan	1.00	\$0.0150
11/05/09	07:50:08 AM	9888798		USA MI Michigan	0.00	\$0.0000
11/05/09	07:51:07 AM	9888798		USA MI Michigan	1.00	\$0.0150
11/05/09	07:52:17 AM	9888798		USA MI Michigan	0.00	\$0.0000
11/05/09	07:52:31 AM	9888798		USA MI Michigan	0.00	\$0.0000
11/05/09	07:53:18 AM	9888798		USA MI Michigan	1.00	\$0.0150
11/06/09	10:40:37 AM	9888798		USA MI Michigan	0.00	\$0.0000
11/06/09	10:42:47 AM	9888798		USA OR Oregon	1.00	\$0.0150
11/06/09	10:45:52 AM	9888798		USA OR Oregon	1.00	\$0.0150
11/06/09	10:46:24 AM	9888798		USA OR Oregon	1.00	\$0.0150
11/06/09	10:48:49 AM	9888798		USA MI Michigan	1.00	\$0.0150
11/06/09	10:49:23 AM	9888798		USA VA Virginia	0.00	\$0.0000
11/06/09	10:49:23 AM	9888798		USA VA Virginia	0.00	\$0.0000
11/06/09	11:07:26 AM	9888798		USA VA Virginia	18.00	\$0.2700
11/06/09	02:11:43 PM	9888798	1231	USA MI Michigan	0.00	\$0.0000
11/06/09	02:11:43 PM	9888798	1231	USA MI Michigan	0.00	\$0.0000
11/06/09	02:11:43 PM	9888798	1231	USA MI Michigan	0.00	\$0.0000
11/06/09	02:11:43 PM	9888798	1231	USA MI Michigan	0.00	\$0.0000
11/06/09	02:11:44 PM	9888798	1231	USA MI Michigan	0.00	\$0.0000

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11/06/09	02:11:44 PM	9888798	1231	USA MI Michigan	0.00	\$0.0000
11/06/09	02:11:44 PM	9888798		USA MI Michigan	0.00	\$0.0000
11/06/09	02:12:22 PM	9888798		USA MI Michigan	0.00	\$0.0000
11/06/09	02:12:23 PM	9888798		USA MI Michigan	0.00	\$0.0000
11/06/09	02:12:25 PM	9888798		USA MI Michigan	0.00	\$0.0000
11/06/09	02:12:25 PM	9888798		USA MI Michigan	0.00	\$0.0000
11/06/09	02:12:29 PM	9888798		USA MI Michigan	0.00	\$0.0000
11/06/09	02:14:13 PM	9888798		USA MI Michigan	2.00	\$0.0300
11/06/09	02:19:01 PM	9888798		USA MI Michigan	4.00	\$0.0600
11/07/09	03:36:21 PM	9888798		USA VA Virginia	2.00	\$0.0300
11/07/09	06:03:28 PM	9888798		USA OH Ohio	6.00	\$0.0900
11/09/09	10:32:13 AM	9888798		USA OH Ohio	0.00	\$0.0000
11/09/09	10:34:56 AM	9888798		USA OH Ohio	0.00	\$0.0000

Information redacted in this document are pursuant to FOIA Exemption (b)(6)

11/09/09	10:55:37 AM	9888798	[REDACTED]	USA OH Ohio	0.00	\$0.0000
11/09/09	11:37:18 AM	9888798	[REDACTED]	USA OH Ohio	0.00	\$0.0000
11/09/09	04:01:31 PM	9888798	[REDACTED]	USA OH Ohio	25.00	\$0.3750
11/10/09	10:12:31 AM	9888798	[REDACTED]	USA OH Ohio	3.00	\$0.0450
11/10/09	12:16:44 PM	9888798	[REDACTED]	USA OH Ohio	2.00	\$0.0300
11/10/09	09:51:46 PM	9888798	[REDACTED]	USA IN Indiana	0.00	\$0.0000
11/10/09	09:53:24 PM	9888798	[REDACTED]	USA IN Indiana	2.00	\$0.0300
11/11/09	03:20:08 PM	9888798	[REDACTED]	USA VA Virginia	1.00	\$0.0150
11/11/09	03:22:41 PM	9888798	[REDACTED]	USA VA Virginia	2.00	\$0.0300
11/11/09	03:44:34 PM	9888798	[REDACTED]	USA VA Virginia	1.00	\$0.0150
11/11/09	09:51:22 PM	9888798	[REDACTED]	USA WA Washington	1.00	\$0.0150
11/12/09	08:19:48 AM	9888798	[REDACTED]	USA VA Virginia	1.00	\$0.0150
11/12/09	08:20:36 AM	9888798	[REDACTED]	USA VA Virginia	1.00	\$0.0150
11/12/09	08:21:08 AM	9888798	[REDACTED]	USA VA Virginia	1.00	\$0.0150
11/12/09	08:24:45 AM	9888798	[REDACTED]	USA VA Virginia	1.00	\$0.0150
11/12/09	08:32:56 AM	9888798	[REDACTED]	USA VA Virginia	1.00	\$0.0150
11/12/09	07:29:51 PM	9888798	123	USA / Canada	0.00	\$0.0000
11/12/09	07:29:51 PM	9888798	123	USA / Canada	0.00	\$0.0000
11/12/09	07:29:52 PM	9888798	123	USA / Canada	0.00	\$0.0000
11/12/09	07:29:52 PM	9888798	123	USA / Canada	0.00	\$0.0000
11/12/09	07:29:52 PM	9888798	123	USA / Canada	0.00	\$0.0000
11/12/09	07:30:46 PM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
11/12/09	07:30:47 PM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
11/12/09	07:30:47 PM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
11/12/09	07:45:43 PM	9888798	[REDACTED]	USA MI Michigan	2.00	\$0.0300
11/14/09	08:44:14 PM	9888798	[REDACTED]	USA VA Virginia	9.00	\$0.1350
11/15/09	09:17:35 PM	9888798	[REDACTED]	USA IN Indiana	0.00	\$0.0000
11/15/09	09:18:18 PM	9888798	[REDACTED]	USA IN Indiana	1.00	\$0.0150

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11/15/09	09:19:42 PM	9888798	[REDACTED]	Canada BC British Columbia 250	0.00	\$0.0000
11/16/09	08:22:49 AM	9888798	[REDACTED]	USA - Toll Free	1.00	\$0.0150
11/16/09	08:35:21 AM	9888798	[REDACTED]	USA - Toll Free	1.00	\$0.0150
11/16/09	10:20:27 AM	9888798	[REDACTED]	USA - Toll Free	6.00	\$0.0900
11/17/09	08:15:59 PM	9888798	[REDACTED]	USA IN Indiana	0.00	\$0.0000
11/17/09	08:21:45 PM	9888798	[REDACTED]	USA IN Indiana	6.00	\$0.0900
11/17/09	08:23:18 PM	9888798	[REDACTED]	Canada BC British Columbia 250	1.00	\$0.0165
11/18/09	11:04:06 PM	9888798	[REDACTED]	USA TX Texas	5.00	\$0.0750
11/19/09	12:20:55 AM	9888798	505	Nicaragua Proper	0.00	\$0.0000
11/19/09	12:20:55 AM	9888798	505	Nicaragua Proper	0.00	\$0.0000
11/19/09	12:21:50 AM	9888798	[REDACTED]	NICARAGUA	0.00	\$0.0000
11/19/09	12:22:42 AM	9888798	[REDACTED]	NICARAGUA	0.00	\$0.0000
11/19/09	12:24:08 AM	9888798	[REDACTED]	NICARAGUA	0.00	\$0.0000
11/20/09	10:35:05 AM	9888798	[REDACTED]	USA OH Ohio	5.00	\$0.0750

Information redacted in this document are pursuant to FOIA Exemption (b)(6)

11/20/09	10:40:28 AM	9888798	[REDACTED]	USA VA Virginia	1.00	\$0.0150
11/20/09	10:41:59 AM	9888798	[REDACTED]	USA VA Virginia	1.00	\$0.0150
11/20/09	12:02:26 PM	9888798	[REDACTED]	USA VA Virginia	13.00	\$0.1950
11/20/09	12:59:11 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
11/20/09	12:59:26 PM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
11/20/09	12:59:32 PM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
11/20/09	01:20:07 PM	9888798	[REDACTED]	USA MI Michigan	20.00	\$0.3000
11/26/09	01:48:01 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
11/26/09	01:48:42 PM	9888798	[REDACTED]	CHINA	0.00	\$0.0000
11/26/09	01:49:03 PM	9888798	[REDACTED]	CHINA	0.00	\$0.0000
11/28/09	11:33:18 AM	9888798	[REDACTED]	USA PA Pennsylvania	1.00	\$0.0150
11/28/09	11:35:07 AM	9888798	[REDACTED]	USA PA Pennsylvania	1.00	\$0.0150
11/28/09	04:14:44 PM	9888798	[REDACTED]	USA PA Pennsylvania	1.00	\$0.0150
11/28/09	04:15:45 PM	9888798	[REDACTED]	USA PA Pennsylvania	1.00	\$0.0150
11/28/09	04:16:42 PM	9888798	[REDACTED]	USA PA Pennsylvania	1.00	\$0.0150
11/28/09	04:20:21 PM	9888798	[REDACTED]	USA OH Ohio	2.00	\$0.0300
11/28/09	09:46:01 PM	9888798	[REDACTED]	USA VA Virginia	1.00	\$0.0150
11/29/09	02:36:54 PM	9888798	[REDACTED]	USA OK Oklahoma	1.00	\$0.0150
11/29/09	03:07:13 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
11/29/09	03:09:33 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
11/29/09	03:11:33 PM	9888798	[REDACTED]	USA OH Ohio	2.00	\$0.0300
11/29/09	07:31:47 PM	9888798	[REDACTED]	USA OK Oklahoma	1.00	\$0.0150
11/30/09	10:25:45 AM	9888798	[REDACTED]	USA OH Ohio	4.00	\$0.0600
11/30/09	11:19:30 AM	9888798	[REDACTED]	USA VA Virginia	8.00	\$0.1200
11/30/09	12:05:41 PM	9888798	[REDACTED]	USA PA Pennsylvania	40.00	\$0.6000
11/30/09	02:51:23 PM	9888798	[REDACTED]	USA MI Michigan	11.00	\$0.1650
12/01/09	09:07:25 PM	9888798	[REDACTED]	USA VA Virginia	1.00	\$0.0150

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12/01/09	09:08:42 PM	9888798	[REDACTED]	USA VA Virginia	1.00	\$0.0150
12/02/09	11:43:15 AM	9888798	[REDACTED]	USA VA Virginia	1.00	\$0.0150
12/02/09	11:44:17 AM	9888798	[REDACTED]	USA VA Virginia	0.00	\$0.0000
12/02/09	11:46:59 AM	9888798	[REDACTED]	USA VA Virginia	1.00	\$0.0150
12/02/09	12:25:49 PM	9888798	[REDACTED]	USA PA Pennsylvania	0.00	\$0.0000
12/02/09	12:26:14 PM	9888798	[REDACTED]	USA PA Pennsylvania	0.00	\$0.0000
12/02/09	12:27:08 PM	9888798	[REDACTED]	USA PA Pennsylvania	0.00	\$0.0000
12/02/09	12:27:47 PM	9888798	[REDACTED]	USA PA Pennsylvania	1.00	\$0.0150
12/02/09	12:28:15 PM	9888798	[REDACTED]	USA PA Pennsylvania	0.00	\$0.0000
12/02/09	12:29:15 PM	9888798	[REDACTED]	USA PA Pennsylvania	1.00	\$0.0150
12/02/09	12:30:13 PM	9888798	[REDACTED]	USA PA Pennsylvania	1.00	\$0.0150
12/02/09	12:30:57 PM	9888798	[REDACTED]	USA PA Pennsylvania	1.00	\$0.0150
12/02/09	12:46:33 PM	9888798	[REDACTED]	USA MI Michigan	6.00	\$0.0900
12/02/09	12:47:55 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
12/02/09	01:01:39 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150

Information redacted in this document are pursuant to FOIA Exemption (b)(6)

12/04/09	10:42:00 AM	9888798	[REDACTED]	USA VA Virginia	1.00	\$0.0150
12/04/09	10:42:43 AM	9888798	[REDACTED]	USA VA Virginia	1.00	\$0.0150
12/04/09	11:06:17 AM	9888798	[REDACTED]	USA VA Virginia	1.00	\$0.0150
12/04/09	04:19:59 PM	9888798	[REDACTED]	USA VA Virginia	1.00	\$0.0150
12/07/09	12:10:02 PM	9888798	[REDACTED]	USA TX Texas	0.00	\$0.0000
12/07/09	12:10:28 PM	9888798	[REDACTED]	USA TX Texas	0.00	\$0.0000
12/07/09	12:10:50 PM	9888798	[REDACTED]	USA TX Texas	0.00	\$0.0000
12/07/09	12:11:38 PM	9888798	[REDACTED]	USA TX Texas	1.00	\$0.0150
12/07/09	12:12:12 PM	9888798	[REDACTED]	USA TX Texas	0.00	\$0.0000
12/07/09	12:12:34 PM	9888798	[REDACTED]	USA TX Texas	0.00	\$0.0000
12/07/09	12:13:13 PM	9888798	[REDACTED]	USA TX Texas	0.00	\$0.0000
12/07/09	12:13:33 PM	9888798	[REDACTED]	USA TX Texas	0.00	\$0.0000
12/07/09	01:06:00 PM	9888798	[REDACTED]	USA TX Texas	0.00	\$0.0000
12/07/09	01:06:42 PM	9888798	[REDACTED]	USA TX Texas	0.00	\$0.0000
12/07/09	02:13:42 PM	9888798	[REDACTED]	USA TX Texas	47.00	\$0.7050
12/07/09	03:15:07 PM	9888798	[REDACTED]	USA MI Michigan	21.00	\$0.3150
12/07/09	11:42:49 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
12/07/09	11:43:42 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
12/07/09	11:51:22 PM	9888798	[REDACTED]	USA MI Michigan	6.00	\$0.0900
12/08/09	01:08:45 AM	9888798	[REDACTED]	LIBERIA	0.00	\$0.0000
12/08/09	01:09:14 AM	9888798	[REDACTED]	LIBERIA	1.00	\$0.2586
12/08/09	01:09:26 AM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
12/08/09	01:09:27 AM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
12/08/09	01:09:43 AM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
12/08/09	01:09:47 AM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
12/08/09	01:09:51 AM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000

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12/08/09	01:23:06 AM	9888798	[REDACTED]	USA MI Michigan	14.00	\$0.2100
12/08/09	06:59:23 AM	9888798	[REDACTED]	USA MI Michigan	7.00	\$0.1050
12/08/09	09:04:47 AM	9888798	[REDACTED]	USA MI Michigan	2.00	\$0.0300
12/08/09	09:18:48 AM	9888798	[REDACTED]	USA Toll Free US/Canada toll free	11.00	\$0.3850
12/08/09	09:20:47 AM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
12/08/09	09:25:09 AM	9888798	[REDACTED]	USA MI Michigan	4.00	\$0.0600
12/08/09	10:45:42 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
12/08/09	10:45:43 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
12/08/09	10:45:43 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
12/08/09	10:45:43 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
12/08/09	10:45:43 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
12/08/09	10:53:39 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
12/08/09	10:53:39 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
12/08/09	10:53:40 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
12/08/09	10:53:40 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000

Information redacted in this document are pursuant to FOIA Exemption (b)(6)

12/08/09	10:53:40 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
12/08/09	10:53:40 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
12/08/09	11:06:01 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
12/08/09	11:06:02 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
12/08/09	11:06:02 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
12/08/09	11:06:02 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
12/08/09	11:06:02 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
12/08/09	11:06:02 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
12/08/09	11:06:03 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
12/08/09	11:06:39 AM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
12/08/09	11:07:27 AM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
12/08/09	11:07:33 AM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
12/08/09	11:09:03 AM	9888798	[REDACTED]	LIBERIA	0.00	\$0.0000
12/08/09	11:09:21 AM	9888798	[REDACTED]	LIBERIA	0.00	\$0.0000
12/08/09	11:09:23 AM	9888798	[REDACTED]	LIBERIA	0.00	\$0.0000
12/08/09	11:09:23 AM	9888798	[REDACTED]	LIBERIA	0.00	\$0.0000
12/08/09	11:09:23 AM	9888798	[REDACTED]	LIBERIA	0.00	\$0.0000
12/08/09	11:09:23 AM	9888798	[REDACTED]	LIBERIA	0.00	\$0.0000
12/08/09	11:09:23 AM	9888798	[REDACTED]	LIBERIA	0.00	\$0.0000
12/08/09	11:09:50 AM	9888798	[REDACTED]	LIBERIA	0.00	\$0.0000
12/08/09	11:10:09 AM	9888798	[REDACTED]	LIBERIA	0.00	\$0.0000
12/08/09	11:10:11 AM	9888798	[REDACTED]	LIBERIA	0.00	\$0.0000
12/08/09	11:10:11 AM	9888798	[REDACTED]	LIBERIA	0.00	\$0.0000
12/08/09	11:10:11 AM	9888798	[REDACTED]	LIBERIA	0.00	\$0.0000
12/08/09	11:10:11 AM	9888798	[REDACTED]	LIBERIA	0.00	\$0.0000
12/08/09	11:12:33 AM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
12/08/09	11:12:39 AM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000

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12/08/09	11:17:59 AM	9888798	[REDACTED]	USA MI Michigan	5.00	\$0.0750
12/08/09	11:21:35 AM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
12/08/09	11:22:31 AM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
12/08/09	11:27:32 AM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
12/08/09	12:43:23 PM	9888798	[REDACTED]	USA MI Michigan	3.00	\$0.0450
12/08/09	12:56:50 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
12/08/09	12:57:42 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
12/08/09	01:08:48 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
12/08/09	01:09:47 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
12/08/09	01:10:35 PM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
12/08/09	01:43:53 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
12/08/09	01:44:42 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
12/08/09	02:07:58 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
12/08/09	04:30:14 PM	9888798	[REDACTED]	USA MI Michigan	5.00	\$0.0750
12/08/09	04:39:29 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
12/08/09	04:40:18 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
12/08/09	05:09:09 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150

Information redacted in this document are pursuant to FOIA Exemption (b)(6)

12/08/09	06:00:01 PM	9888798		USA MI Michigan	1.00	\$0.0150
12/08/09	07:22:03 PM	9888798		Puerto Rico Puerto Rico	1.00	\$0.0150
12/08/09	11:09:37 PM	9888798		Puerto Rico Puerto Rico	6.00	\$0.0900
12/09/09	10:20:22 PM	9888798		USA MI Michigan	2.00	\$0.0300
12/10/09	01:15:27 PM	9888798		USA MI Michigan	22.00	\$0.3300
12/10/09	01:24:18 PM	9888798		Puerto Rico Puerto Rico	0.00	\$0.0000
12/10/09	01:25:01 PM	9888798		Puerto Rico Puerto Rico	0.00	\$0.0000
12/10/09	01:27:58 PM	9888798		Puerto Rico Puerto Rico	2.00	\$0.0400
12/11/09	10:33:15 PM	9888798		USA IN Indiana	1.00	\$0.0150
12/11/09	11:00:16 PM	9888798		USA IN Indiana	26.00	\$0.3900
12/13/09	08:29:28 AM	9888798		USA MI Michigan	11.00	\$0.1650
12/17/09	10:00:37 PM	9888798		USA IN Indiana	0.00	\$0.0000
12/17/09	10:32:55 PM	9888798		USA IN Indiana	1.00	\$0.0150
12/17/09	10:34:11 PM	9888798		USA IN Indiana	0.00	\$0.0000
12/17/09	10:34:11 PM	9888798		USA IN Indiana	0.00	\$0.0000
12/17/09	10:49:02 PM	9888798		USA IN Indiana	0.00	\$0.0000
12/17/09	10:49:03 PM	9888798		USA IN Indiana	0.00	\$0.0000
12/17/09	11:20:53 PM	9888798		USA IN Indiana	0.00	\$0.0000
12/17/09	11:43:57 PM	9888798		USA IN Indiana	0.00	\$0.0000
12/18/09	12:12:10 AM	9888798		USA IN Indiana	0.00	\$0.0000
12/18/09	01:12:38 AM	9888798		USA IN Indiana	1.00	\$0.0150
12/18/09	01:13:16 AM	9888798		USA IN Indiana	1.00	\$0.0150
12/18/09	01:14:22 AM	9888798		USA IN Indiana	1.00	\$0.0150
12/20/09	08:28:17 AM	9888798		USA MI Michigan	8.00	\$0.1200

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12/21/09	08:57:25 AM	9888798		USA MI Michigan	6.00	\$0.0900
12/21/09	10:26:13 AM	9888798		USA MI Michigan	4.00	\$0.0600
12/21/09	08:26:34 PM	9888798		CHINA	0.00	\$0.0000
12/21/09	08:27:11 PM	9888798		CHINA	1.00	\$0.0176
12/21/09	08:28:01 PM	9888798		CHINA	0.00	\$0.0000
12/21/09	08:28:33 PM	9888798		CHINA	0.00	\$0.0000
12/22/09	07:28:42 PM	9888798		Puerto Rico Puerto Rico	1.00	\$0.0150
12/22/09	07:29:54 PM	9888798		Puerto Rico Puerto Rico	1.00	\$0.0150
12/22/09	07:30:52 PM	9888798		Puerto Rico - Mobile	0.00	\$0.0000
12/22/09	07:32:35 PM	9888798		Puerto Rico - Mobile	0.00	\$0.0000
12/22/09	07:34:02 PM	9888798		Puerto Rico Puerto Rico	1.00	\$0.0150
12/22/09	09:52:42 PM	9888798		Puerto Rico Puerto Rico	1.00	\$0.0150
12/22/09	11:49:02 PM	9888798		Puerto Rico - Mobile	4.00	\$0.0600
12/25/09	09:30:38 AM	9888798		USA MI Michigan	23.00	\$0.3450
12/25/09	09:51:55 AM	9888798		USA MI Michigan	6.00	\$0.0900
12/30/09	02:53:22 PM	9888798		USA MI Michigan	1.00	\$0.0150
12/30/09	02:54:08 PM	9888798		USA MI Michigan	1.00	\$0.0150
12/30/09	03:00:36 PM	9888798		USA MI Michigan	6.00	\$0.0900

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01/01/10	12:12:31 AM	9888798	[REDACTED]	USA MI Michigan	9.00	\$0.1350
01/05/10	04:50:04 PM	9888798	[REDACTED]	USA VA Virginia	3.00	\$0.0450
01/07/10	10:25:47 PM	9888798	[REDACTED]	Puerto Rico Puerto Rico	1.00	\$0.0200
01/12/10	09:34:00 AM	9888798	[REDACTED]	USA MI Michigan	2.00	\$0.0300
01/14/10	01:20:31 PM	9888798	[REDACTED]	Puerto Rico Puerto Rico	1.00	\$0.0150
01/14/10	01:30:58 PM	9888798	[REDACTED]	Puerto Rico - Mobile	0.00	\$0.0000
01/14/10	01:32:23 PM	9888798	[REDACTED]	Puerto Rico - Mobile	1.00	\$0.0150
01/17/10	12:55:07 PM	9888798	[REDACTED]	Puerto Rico Puerto Rico	3.00	\$0.0450
01/17/10	09:49:42 PM	9888798	[REDACTED]	Mayotte Island Mobile	0.00	\$0.0000
01/17/10	09:50:55 PM	9888798	[REDACTED]	Mayotte Island Mobile	2.00	\$1.7820
01/17/10	09:52:38 PM	9888798	[REDACTED]	Mayotte Island Mobile	0.00	\$0.0000
01/17/10	09:53:56 PM	9888798	[REDACTED]	Mayotte Island Mobile	2.00	\$1.7820
01/19/10	05:48:17 PM	9888798	[REDACTED]	Mayotte Island Mobile	0.00	\$0.0000
01/19/10	05:49:16 PM	9888798	[REDACTED]	Mayotte Island Mobile	0.00	\$0.0000
01/19/10	05:49:17 PM	9888798	[REDACTED]	Mayotte Island Mobile	0.00	\$0.0000
01/19/10	05:49:17 PM	9888798	[REDACTED]	Mayotte Island Mobile	0.00	\$0.0000
01/19/10	05:49:17 PM	9888798	[REDACTED]	Mayotte Island Mobile	0.00	\$0.0000
01/19/10	05:49:17 PM	9888798	[REDACTED]	Mayotte Island Mobile	0.00	\$0.0000
01/19/10	05:49:17 PM	9888798	[REDACTED]	Mayotte Island Mobile	0.00	\$0.0000
01/19/10	05:49:34 PM	9888798	[REDACTED]	Mayotte Island Mobile	0.00	\$0.0000
01/19/10	05:51:10 PM	9888798	[REDACTED]	Mayotte Island Mobile	2.00	\$1.7820
01/19/10	05:51:18 PM	9888798	[REDACTED]	Mayotte Island Mobile	0.00	\$0.0000
01/19/10	05:52:35 PM	9888798	[REDACTED]	Mayotte Island Mobile	2.00	\$1.7820
01/19/10	10:47:23 PM	9888798	[REDACTED]	Puerto Rico Puerto Rico	0.00	\$0.0000

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01/19/10	10:47:23 PM	9888798	[REDACTED]	Puerto Rico Puerto Rico	0.00	\$0.0000
01/19/10	10:47:24 PM	9888798	[REDACTED]	Puerto Rico Puerto Rico	0.00	\$0.0000
01/19/10	10:47:29 PM	9888798	[REDACTED]	Puerto Rico Puerto Rico	0.00	\$0.0000
01/19/10	10:47:29 PM	9888798	[REDACTED]	Puerto Rico Puerto Rico	0.00	\$0.0000
01/19/10	10:47:29 PM	9888798	[REDACTED]	Puerto Rico Puerto Rico	0.00	\$0.0000
01/19/10	10:47:29 PM	9888798	[REDACTED]	Puerto Rico Puerto Rico	0.00	\$0.0000
01/19/10	10:47:29 PM	9888798	[REDACTED]	Puerto Rico Puerto Rico	0.00	\$0.0000
01/30/10	10:33:10 PM	9888798	[REDACTED]	Canada AB Alberta 403	1.00	\$0.0165
01/30/10	10:49:43 PM	9888798	[REDACTED]	USA MI Michigan	16.00	\$0.2400
01/30/10	11:09:02 PM	9888798	[REDACTED]	USA MI Michigan	19.00	\$0.2850
01/31/10	02:08:49 PM	9888798	[REDACTED]	Puerto Rico - Mobile	0.00	\$0.0000
01/31/10	02:10:56 PM	9888798	[REDACTED]	Puerto Rico - Mobile	0.00	\$0.0000
01/31/10	02:12:19 PM	9888798	[REDACTED]	Puerto Rico Puerto Rico	1.00	\$0.0200
01/31/10	02:38:05 PM	9888798	[REDACTED]	Puerto Rico Puerto Rico	1.00	\$0.0200
02/04/10	11:55:14 AM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
02/04/10	12:31:01 PM	9888798	[REDACTED]	USA MI Michigan	4.00	\$0.0600
02/05/10	12:06:28 PM	9888798	[REDACTED]	USA KY Kentucky	0.00	\$0.0000
02/05/10	12:10:06 PM	9888798	[REDACTED]	USA KY Kentucky	4.00	\$0.0600
02/13/10	09:38:26 PM	9888798	[REDACTED]	Puerto Rico - Mobile	0.00	\$0.0000

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02/13/10	09:40:39 PM	9888798	[REDACTED]	Puerto Rico - Mobile	2.00	\$0.0300
02/13/10	10:02:41 PM	9888798	[REDACTED]	USA OH Ohio	4.00	\$0.0600
02/14/10	10:20:55 AM	9888798	[REDACTED]	USA OH Ohio	0.00	\$0.0000
02/14/10	10:21:26 AM	9888798	[REDACTED]	USA OH Ohio	0.00	\$0.0000
02/14/10	10:27:34 PM	9888798	[REDACTED]	Puerto Rico - Mobile	7.00	\$0.1050
02/15/10	06:50:51 PM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
02/15/10	07:31:06 PM	9888798	[REDACTED]	USA MI Michigan	40.00	\$0.6000
02/17/10	12:15:44 PM	9888798	[REDACTED]	USA MI Michigan	25.00	\$0.3750
02/19/10	11:11:00 PM	9888798	[REDACTED]	USA MI Michigan	39.00	\$0.5850
02/20/10	05:21:43 PM	9888798	[REDACTED]	USA VA Virginia	18.00	\$0.2700
02/24/10	10:53:33 AM	9888798	[REDACTED]	Puerto Rico Puerto Rico	1.00	\$0.0150
02/24/10	10:55:45 AM	9888798	[REDACTED]	Puerto Rico - Mobile	2.00	\$0.0300
03/16/10	07:17:15 PM	9888798	[REDACTED]	Puerto Rico - Mobile	0.00	\$0.0000
03/18/10	08:50:47 PM	9888798	[REDACTED]	USA IN Indiana	1.00	\$0.0150
03/18/10	09:00:00 PM	9888798	[REDACTED]	USA IN Indiana	9.00	\$0.1350
03/18/10	10:13:26 PM	9888798	[REDACTED]	USA IN Indiana	5.00	\$0.0750
03/18/10	10:37:27 PM	9888798	[REDACTED]	USA IN Indiana	15.00	\$0.2250
03/18/10	11:32:27 PM	9888798	[REDACTED]	USA IN Indiana	53.00	\$0.7950
03/19/10	12:04:17 AM	9888798	[REDACTED]	USA IN Indiana	31.00	\$0.4650
03/19/10	12:41:44 AM	9888798	[REDACTED]	USA IN Indiana	36.00	\$0.5400
03/23/10	10:52:45 AM	9888798	[REDACTED]	USA MI Michigan	5.00	\$0.0750
03/24/10	04:55:39 PM	9888798	[REDACTED]	USA Toll Free US/Canada toll free	3.00	\$0.1050

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03/24/10	05:02:11 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
03/24/10	05:09:58 PM	9888798	[REDACTED]	USA MI Michigan	8.00	\$0.1200
03/24/10	05:22:42 PM	9888798	[REDACTED]	USA Toll Free US/Canada toll free	11.00	\$0.3850
03/24/10	05:23:02 PM	9888798	[REDACTED]	USA PA Pennsylvania	0.00	\$0.0000
03/24/10	05:23:02 PM	9888798	[REDACTED]	USA PA Pennsylvania	0.00	\$0.0000
03/24/10	05:23:02 PM	9888798	[REDACTED]	USA PA Pennsylvania	0.00	\$0.0000
03/24/10	05:23:02 PM	9888798	[REDACTED]	USA PA Pennsylvania	0.00	\$0.0000
03/24/10	05:23:04 PM	9888798	[REDACTED]	USA PA Pennsylvania	0.00	\$0.0000
03/24/10	05:23:04 PM	9888798	[REDACTED]	USA PA Pennsylvania	0.00	\$0.0000
03/24/10	05:23:05 PM	9888798	[REDACTED]	USA PA Pennsylvania	0.00	\$0.0000
03/24/10	05:23:05 PM	9888798	[REDACTED]	USA PA Pennsylvania	0.00	\$0.0000
03/24/10	05:24:00 PM	9888798	[REDACTED]	USA PA Pennsylvania	1.00	\$0.0150
03/24/10	05:25:00 PM	9888798	[REDACTED]	USA PA Pennsylvania	1.00	\$0.0150
03/24/10	05:26:07 PM	9888798	[REDACTED]	USA PA Pennsylvania	1.00	\$0.0150
03/24/10	05:31:27 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
03/26/10	03:07:29 PM	9888798	[REDACTED]	USA PA Pennsylvania	10.00	\$0.1500
03/26/10	03:17:05 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
03/26/10	03:47:52 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0150
03/27/10	10:05:25 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:05:25 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000

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03/27/10	10:05:25 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:05:25 AM	9888798	[REDACTED]	No Match	0.00	\$0.0000
03/27/10	10:05:25 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:05:25 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:06:18 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:06:18 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:06:18 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:06:18 AM	9888798	[REDACTED]	No Match	0.00	\$0.0000
03/27/10	10:06:18 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:06:19 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:08:09 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:08:10 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:08:10 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:08:10 AM	9888798	[REDACTED]	No Match	0.00	\$0.0000
03/27/10	10:08:10 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:08:10 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:09:23 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:09:24 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:09:24 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:09:24 AM	9888798	[REDACTED]	No Match	0.00	\$0.0000
03/27/10	10:09:24 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000

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Detailed Client Report

Period: 01/01/08 - 11/24/10

03/27/10	10:09:24 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:09:56 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:09:56 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:09:57 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:09:57 AM	9888798	[REDACTED]	No Match	0.00	\$0.0000
03/27/10	10:09:57 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:09:57 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:10:30 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:10:30 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:10:31 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:10:31 AM	9888798	[REDACTED]	No Match	0.00	\$0.0000
03/27/10	10:10:31 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:10:31 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:11:27 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:11:28 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:11:28 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:11:28 AM	9888798	[REDACTED]	No Match	0.00	\$0.0000
03/27/10	10:11:28 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:11:28 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:12:16 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:12:17 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000

Information redacted in this document are pursuant to FOIA Exemption (b)(6)

03/27/10	10:12:17 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:12:17 AM	9888798	[REDACTED]	No Match	0.00	\$0.0000
03/27/10	10:12:17 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:12:17 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:42:25 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:42:25 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:42:25 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:42:25 AM	9888798	[REDACTED]	No Match	0.00	\$0.0000
03/27/10	10:42:25 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:42:26 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:49:12 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:49:13 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:49:13 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:49:13 AM	9888798	[REDACTED]	No Match	0.00	\$0.0000
03/27/10	10:49:13 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	10:49:13 AM	9888798	[REDACTED]	USA / Canada	0.00	\$0.0000
03/27/10	09:55:30 PM	9888798	[REDACTED]	USA MI Michigan	3.00	\$0.0450
03/28/10	11:33:20 PM	9888798	[REDACTED]	USA MI Michigan	3.00	\$0.0450
03/29/10	10:06:13 AM	9888798	[REDACTED]	USA Toll Free US/Canada toll free	6.00	\$0.2100
03/31/10	08:22:07 AM	9888798	[REDACTED]	USA MI Michigan	6.00	\$0.0450

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Detailed Client Report

Period: 01/01/08 - 11/24/10

03/31/10	05:17:58 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0075
03/31/10	05:18:57 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0075
04/04/10	08:55:34 AM	9888798	[REDACTED]	USA OH Ohio	3.00	\$0.0225
04/04/10	08:56:24 AM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0075
04/04/10	08:57:24 AM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0075
04/04/10	09:42:21 AM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0075
04/04/10	09:43:10 AM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0075
04/04/10	10:09:21 AM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0075
04/04/10	10:10:09 AM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0075
04/04/10	10:10:58 AM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0075
04/04/10	10:12:34 AM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0075
04/04/10	10:27:05 AM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0075
04/04/10	10:30:12 AM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0075
04/04/10	10:33:29 AM	9888798	[REDACTED]	USA OH Ohio	0.00	\$0.0000
04/04/10	10:35:04 AM	9888798	[REDACTED]	USA OH Ohio	0.00	\$0.0000
04/04/10	10:39:21 AM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0075
04/04/10	10:44:16 AM	9888798	[REDACTED]	USA OH Ohio	0.00	\$0.0000
04/04/10	10:51:48 AM	9888798	[REDACTED]	USA OH Ohio	0.00	\$0.0000
04/25/10	06:40:45 PM	9888798	[REDACTED]	Usa / Can Code	1.00	\$0.0075
04/25/10	07:44:53 PM	9888798	[REDACTED]	Usa / Can Code	58.00	\$0.4524
04/26/10	02:00:31 PM	9888798	[REDACTED]	Usa / Can Code	60.00	\$0.4500
04/28/10	10:04:42 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0075

Information redacted in this document are pursuant to FOIA Exemption (b)(6)

04/28/10	10:20:02 PM	9888798	[REDACTED]	USA OH Ohio	15.00	\$0.1125
05/04/10	11:50:47 PM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
05/08/10	12:13:20 PM	9888798	[REDACTED]	USA OH Ohio	4.00	\$0.0300
05/10/10	01:11:39 PM	9888798	[REDACTED]	USA PA Pennsylvania	0.00	\$0.0000
05/10/10	01:11:55 PM	9888798	[REDACTED]	USA PA Pennsylvania	0.00	\$0.0000
05/10/10	01:12:18 PM	9888798	[REDACTED]	USA PA Pennsylvania	0.00	\$0.0000
05/10/10	01:15:20 PM	9888798	[REDACTED]	USA PA Pennsylvania	3.00	\$0.0225
05/10/10	05:14:11 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0075
05/10/10	05:15:00 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0075
05/10/10	05:30:09 PM	9888798	[REDACTED]	USA OH Ohio	5.00	\$0.0375
05/10/10	05:31:17 PM	9888798	[REDACTED]	USA TN Tennessee	1.00	\$0.0075
05/10/10	05:32:47 PM	9888798	[REDACTED]	USA TN Tennessee	1.00	\$0.0075
05/10/10	06:14:24 PM	9888798	[REDACTED]	USA TN Tennessee	30.00	\$0.2250
05/10/10	06:18:00 PM	9888798	[REDACTED]	USA TN Tennessee	1.00	\$0.0075
05/10/10	06:18:23 PM	9888798	[REDACTED]	USA GA Georgia	0.00	\$0.0000
05/10/10	06:18:26 PM	9888798	[REDACTED]	USA GA Georgia	0.00	\$0.0000
05/10/10	06:29:50 PM	9888798	[REDACTED]	USA TN Tennessee	11.00	\$0.0825
05/11/10	07:45:16 PM	9888798	[REDACTED]	USA OK Oklahoma	1.00	\$0.0075
05/11/10	07:46:29 PM	9888798	[REDACTED]	USA OK Oklahoma	0.00	\$0.0000

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Detailed Client Report

Period: 01/01/08 - 11/24/10

05/12/10	10:03:43 AM	9888798	[REDACTED]	USA OK Oklahoma	0.00	\$0.0000
05/12/10	10:12:40 AM	9888798	[REDACTED]	USA OK Oklahoma	7.00	\$0.0525
05/12/10	12:02:28 PM	9888798	[REDACTED]	USA TN Tennessee	2.00	\$0.0150
05/12/10	12:08:40 PM	9888798	[REDACTED]	USA TN Tennessee	0.00	\$0.0000
05/12/10	02:52:10 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0075
05/17/10	11:17:41 AM	9888798	[REDACTED]	USA OH Ohio	4.00	\$0.0300
05/30/10	04:33:27 PM	9888798	[REDACTED]	USA OH Ohio	1.00	\$0.0075
05/31/10	09:47:43 AM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0075
05/31/10	09:48:15 AM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0075
05/31/10	10:05:33 AM	9888798	[REDACTED]	USA MI Michigan	17.00	\$0.1275
06/02/10	12:43:57 PM	9888798	[REDACTED]	USA OK Oklahoma	14.00	\$0.1050
06/02/10	02:59:56 PM	9888798	[REDACTED]	USA MI Michigan	55.00	\$0.4125
06/05/10	05:23:14 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0075
06/06/10	05:03:28 PM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
06/06/10	05:04:11 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0075
06/06/10	05:05:04 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0075
06/06/10	10:14:32 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0075
06/07/10	09:31:48 PM	9888798	[REDACTED]	Liberia Mobile - Other Carriers	0.00	\$0.0000
06/07/10	09:31:50 PM	9888798	[REDACTED]	Liberia Mobile - Other Carriers	0.00	\$0.0000
06/07/10	09:31:51 PM	9888798	[REDACTED]	Liberia Mobile - Other Carriers	0.00	\$0.0000
06/07/10	09:31:55 PM	9888798	[REDACTED]	Liberia Mobile - Other Carriers	0.00	\$0.0000
06/07/10	09:32:55 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
06/07/10	09:34:20 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150

Information redacted in this document are pursuant to FOIA Exemption (b)(6)

06/07/10	09:38:07 PM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
06/07/10	09:40:58 PM	9888798	[REDACTED]	USA MI Michigan	3.00	\$0.0450
06/07/10	09:45:06 PM	9888798	[REDACTED]	USA MI Michigan	3.00	\$0.0450
06/07/10	09:47:59 PM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
06/07/10	09:49:13 PM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
06/07/10	09:51:01 PM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
06/07/10	09:52:06 PM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
06/07/10	10:00:53 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
06/07/10	10:12:18 PM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
06/12/10	04:29:03 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
06/12/10	04:30:02 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
06/12/10	04:30:48 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
06/12/10	04:31:08 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
06/12/10	04:34:29 PM	9888798	[REDACTED]	USA MI Michigan	3.00	\$0.0450
06/12/10	05:02:22 PM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
06/12/10	05:03:01 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
06/12/10	05:03:13 PM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
06/12/10	05:03:49 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150

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Detailed Client Report

06/12/10	05:08:16 PM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
06/12/10	05:09:12 PM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
06/12/10	05:49:47 PM	9888798	[REDACTED]	USA MI Michigan	11.00	\$0.1650
06/14/10	08:30:23 AM	9888798	[REDACTED]	USA MI Michigan	0.00	\$0.0000
06/14/10	08:32:10 AM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
06/14/10	08:33:12 AM	9888798	[REDACTED]	USA MI Michigan	1.00	\$0.0150
06/14/10	08:55:47 AM	9888798	[REDACTED]	USA MI Michigan	2.00	\$0.0300
09/20/10	01:27:18 PM	9888798	[REDACTED]	USA MI TraverseCity	2.00	\$0.0300

Period: 01/01/08 - 11/24/10

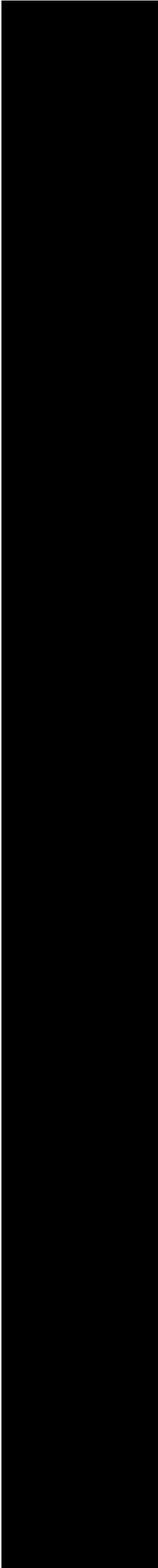
Total Minutes: 3,848.00

Total Calls: 1,069

Total Amount:

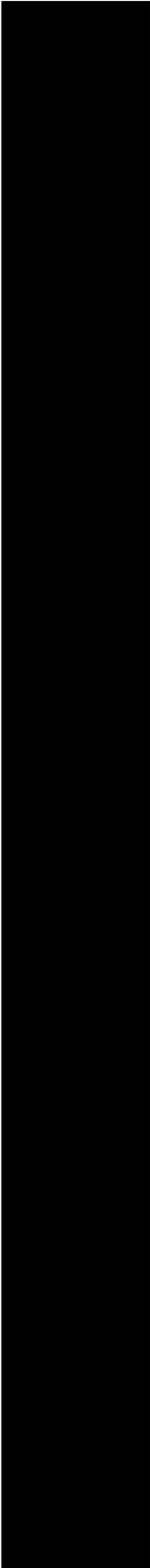
\$69.7221

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**IP to IP CALLS MADE**

7/15/2009 22:16	7/15/2009	0:00:30
7/15/2009 22:17	7/15/2009	0:00:06
7/15/2009 22:17	7/15/2009	0:00:04
7/19/2009 20:58	7/19/2009	0:49:28
7/25/2009 16:00	7/25/2009	0:15:19
7/30/2009 18:31	7/30/2009	0:23:07
7/30/2009 21:11	7/30/2009	0:00:11
8/1/2009 21:16	8/1/2009	0:46:25
8/11/2009 22:21	8/11/2009	0:00:02
8/11/2009 22:23	8/11/2009	0:30:37
8/11/2009 22:55	8/11/2009	0:15:07
8/13/2009 9:25	8/13/2009	0:21:23
8/20/2009 21:48	8/20/2009	0:00:00
8/20/2009 21:47	8/20/2009	0:00:02
8/20/2009 21:52	8/20/2009	0:00:05
8/20/2009 21:55	8/20/2009	0:00:09
8/20/2009 21:59	8/20/2009	0:00:06
8/20/2009 22:45	8/20/2009	0:00:10
8/21/2009 19:49	8/21/2009	0:00:06
8/21/2009 21:11	8/21/2009	0:00:05
8/21/2009 21:20	8/21/2009	0:38:23
8/28/2009 21:36	8/28/2009	0:38:44
8/28/2009 22:15	8/28/2009	2:46:51
8/29/2009 21:24	8/29/2009	0:21:56
8/30/2009 16:07	8/30/2009	--:--:--
8/30/2009 22:32	8/30/2009	0:41:49
8/30/2009 22:30	8/30/2009	0:00:02
8/30/2009 23:16	8/30/2009	0:00:44
8/30/2009 23:14	8/30/2009	--:--:--
8/30/2009 23:16	8/30/2009	0:36:20
9/1/2009 9:18	9/1/2009	0:00:03
9/1/2009 9:19	9/1/2009	0:05:27
9/1/2009 9:32	9/1/2009	--:--:--
9/1/2009 9:33	9/1/2009	0:00:10
9/3/2009 21:04	9/3/2009	0:00:20
9/3/2009 21:17	9/3/2009	0:50:37
9/10/2009 21:58	9/10/2009	0:07:36
9/10/2009 22:09	9/10/2009	0:00:03
9/11/2009 19:55	9/11/2009	0:00:04
9/11/2009 19:56	9/11/2009	0:00:01
9/12/2009 20:51	9/12/2009	0:00:02
9/12/2009 21:05	9/12/2009	1:04:50

All redactions in this document are done pursuant to FOIA Exemption (b)(6)



9/21/2009 21:55	9/21/2009	0:00:20
9/21/2009 22:03	9/21/2009	0:25:02
9/26/2009 22:08	9/26/2009	2:26:38
9/30/2009 12:40	9/30/2009	0:01:53
10/1/2009 17:10	10/1/2009	0:06:37
10/1/2009 21:13	10/1/2009	0:00:04
10/3/2009 20:57	10/3/2009	0:00:04
10/3/2009 20:56	10/3/2009	0:00:04
10/3/2009 22:15	10/3/2009	0:02:32
10/3/2009 22:18	10/3/2009	0:57:07
10/12/2009 20:58	10/12/2009	0:00:03
10/15/2009 22:47	10/15/2009	0:00:13
10/16/2009 8:56	10/16/2009	0:00:04
10/16/2009 8:58	10/16/2009	0:00:02
10/16/2009 8:58	10/16/2009	0:00:02
10/24/2009 21:49	10/24/2009	0:53:51
10/26/2009 20:29	10/26/2009	0:00:16
10/26/2009 20:38	10/26/2009	0:50:39
10/26/2009 20:38	10/26/2009	0:00:04
10/26/2009 21:30	10/26/2009	0:25:30
11/2/2009 15:33	11/2/2009	0:10:08
11/6/2009 10:29	11/6/2009	--:--:--
11/6/2009 10:29	11/6/2009	--:--:--
11/18/2009 17:14	11/18/2009	0:07:51
12/8/2009 19:24	12/8/2009	0:00:20
12/8/2009 22:42	12/8/2009	0:00:05
12/8/2009 22:40	12/8/2009	0:00:21
12/8/2009 19:54	12/8/2009	0:00:16
12/8/2009 19:17	12/8/2009	0:00:30
12/8/2009 19:18	12/8/2009	0:00:18
1/7/2010 22:06	1/7/2010	0:00:20
1/7/2010 22:07	1/7/2010	0:00:11
1/16/2010 22:21	1/16/2010	0:00:29
1/16/2010 22:47	1/16/2010	0:00:17
1/19/2010 22:26	1/19/2010	0:00:06
1/21/2010 11:38	1/21/2010	0:17:30
1/21/2010 12:02	1/21/2010	0:00:11
1/22/2010 17:14	1/22/2010	0:00:10
1/22/2010 17:11	1/22/2010	0:00:05
1/22/2010 22:39	1/22/2010	0:00:10
1/24/2010 19:55	1/24/2010	0:00:09
1/24/2010 19:56	1/24/2010	0:00:09
1/24/2010 19:58	1/24/2010	0:00:02
1/24/2010 19:54	1/24/2010	0:00:07
1/24/2010 20:06	1/24/2010	0:00:02
1/25/2010 11:53	1/25/2010	0:00:08
1/31/2010 13:50	1/31/2010	0:00:07

All redactions in this document are done pursuant to FOIA Exemption (b)(6)

1/31/2010 13:51	1/31/2010	0:00:10
1/31/2010 14:19	1/31/2010	0:00:03

IP to IP CALLS RECEIVED

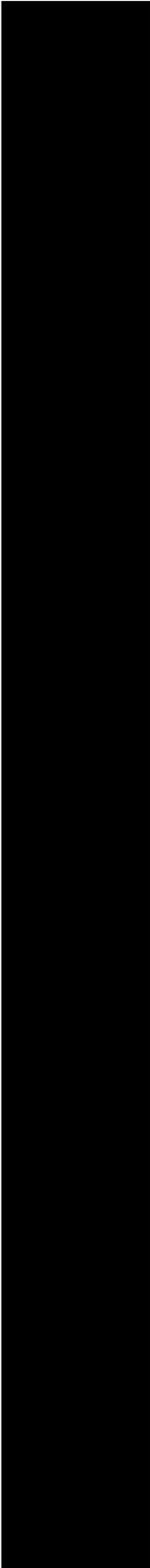
4/9/2009 13:28	4/9/2009	--:--:--
4/10/2009 18:26	4/10/2009	0:04:37
4/11/2009 14:49	4/11/2009	0:49:16
4/11/2009 14:48	4/11/2009	0:00:13
4/13/2009 20:57	4/13/2009	0:45:58
4/14/2009 16:05	4/14/2009	0:32:18
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4/15/2009 14:45	4/15/2009	0:02:47
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4/16/2009 18:20	4/16/2009	0:00:16
4/21/2009 7:16	4/21/2009	0:00:17
4/21/2009 7:19	4/21/2009	0:00:08
4/21/2009 10:49	4/21/2009	0:00:05
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4/22/2009 18:14	4/22/2009	0:00:26
4/22/2009 18:17	4/22/2009	0:00:25
4/22/2009 18:18	4/22/2009	0:00:08
4/22/2009 18:30	4/22/2009	0:00:05
4/24/2009 21:40	4/24/2009	0:49:48
4/28/2009 11:11	4/28/2009	0:00:10
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4/28/2009 20:10	4/28/2009	0:00:07
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All redactions in this document are done pursuant to FOIA Exemption (b)(6)



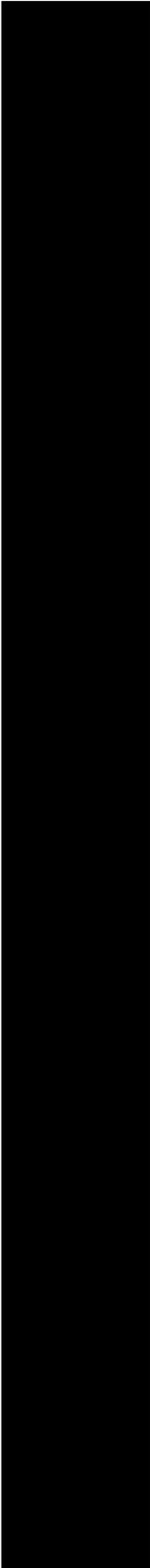
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7/12/2009 22:27	7/12/2009	0:00:20
7/14/2009 18:16	7/14/2009	0:00:16
7/15/2009 13:25	7/15/2009	0:06:55
7/15/2009 22:19	7/15/2009	0:00:21
7/15/2009 22:19	7/15/2009	0:00:20
7/15/2009 22:17	7/15/2009	0:00:39
7/15/2009 22:34	7/15/2009	1:19:57
7/15/2009 22:36	7/15/2009	0:00:03
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7/25/2009 19:56	7/25/2009	0:00:08
7/25/2009 20:02	7/25/2009	0:47:05
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7/26/2009 18:50	7/26/2009	0:51:42
7/26/2009 20:30	7/26/2009	0:33:09
7/26/2009 21:09	7/26/2009	0:00:10
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7/26/2009 21:20	7/26/2009	0:36:02
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All redactions in this document are done pursuant to FOIA Exemption (b)(6)



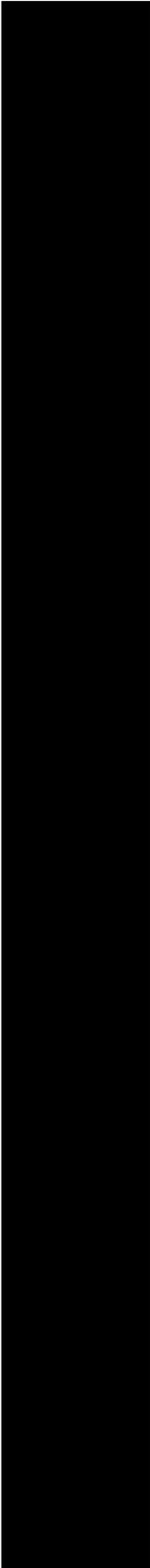
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8/20/2009 12:19	8/20/2009	0:37:06
8/21/2009 21:17	8/21/2009	0:00:23
8/22/2009 8:43	8/22/2009	0:44:46
8/22/2009 21:55	8/22/2009	0:18:54
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8/23/2009 23:13	8/23/2009	0:55:14
8/23/2009 23:13	8/23/2009	0:00:00
8/28/2009 21:35	8/28/2009	0:00:08
8/29/2009 1:02	8/29/2009	0:00:09
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8/29/2009 19:37	8/29/2009	0:05:51
8/29/2009 19:44	8/29/2009	1:08:13
8/30/2009 15:29	8/30/2009 --:--:--	
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8/30/2009 18:01	8/30/2009	0:00:05
8/30/2009 18:10	8/30/2009	0:00:05
8/30/2009 22:31	8/30/2009	0:00:12
8/30/2009 23:14	8/30/2009	0:00:16
8/31/2009 16:17	8/31/2009	0:16:09
8/31/2009 16:35	8/31/2009	0:02:32
9/1/2009 6:18	9/1/2009	0:16:16
9/1/2009 18:01	9/1/2009	0:02:55
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9/4/2009 18:13	9/4/2009	0:00:48
9/4/2009 20:47	9/4/2009	0:00:16
9/6/2009 19:42	9/6/2009	0:00:24
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9/9/2009 15:28	9/9/2009	0:00:08

All redactions in this document are done pursuant to FOIA Exemption (b)(6)



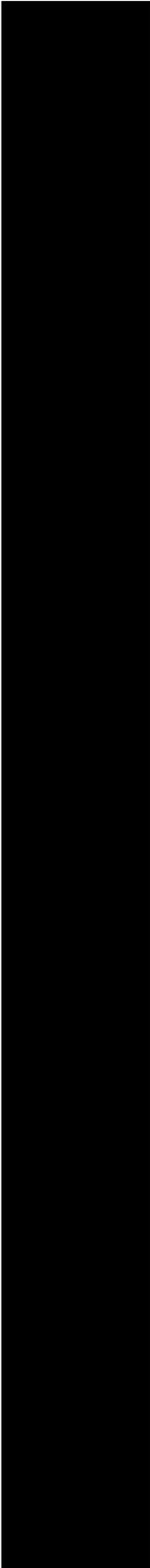
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9/9/2009 15:22	9/9/2009	0:00:12
9/9/2009 15:39	9/9/2009	0:00:04
9/10/2009 17:05	9/10/2009	0:51:18
9/10/2009 17:00	9/10/2009	0:01:52
9/10/2009 18:25	9/10/2009	0:03:57
9/11/2009 13:49	9/11/2009	0:09:32
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9/30/2009 15:14	9/30/2009	0:09:02
10/1/2009 10:09	10/1/2009	0:00:08
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All redactions in this document are done pursuant to FOIA Exemption (b)(6)



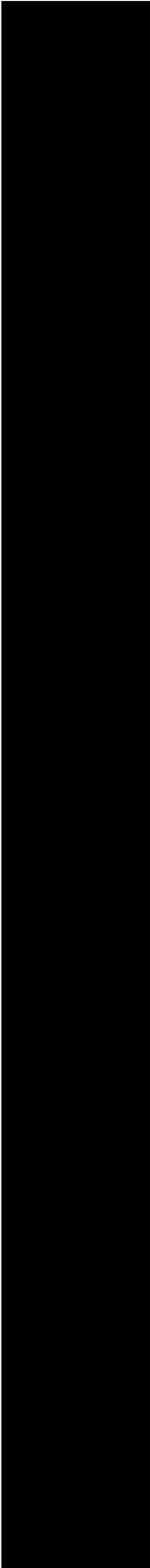
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10/1/2009 10:24	10/1/2009	0:00:05
10/1/2009 10:28	10/1/2009	0:00:06
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10/2/2009 13:59	10/2/2009	0:00:48
10/2/2009 16:06	10/2/2009	1:19:43
10/3/2009 8:41	10/3/2009	0:05:26
10/3/2009 9:56	10/3/2009	0:42:55
10/3/2009 22:14	10/3/2009	0:00:05
10/5/2009 9:32	10/5/2009	0:05:17
10/7/2009 21:49	10/7/2009	0:12:27
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10/9/2009 15:58	10/9/2009	0:06:22
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10/13/2009 21:23	10/13/2009	1:11:14
10/18/2009 19:21	10/18/2009	0:00:29
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11/3/2009 20:15	11/3/2009	0:08:17
11/4/2009 11:16	11/4/2009	0:04:10
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All redactions in this document are done pursuant to FOIA Exemption (b)(6)



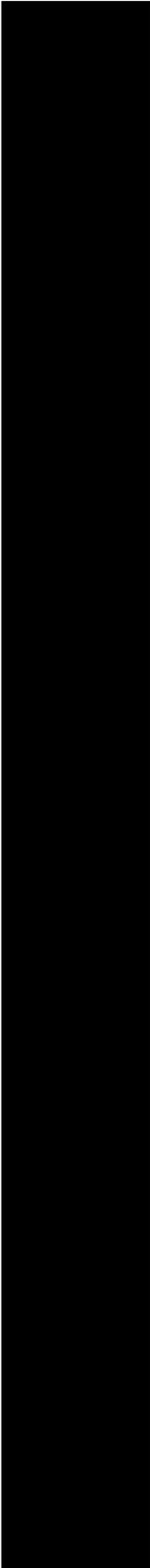
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11/6/2009 8:20	11/6/2009	0:00:17
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11/6/2009 8:29	11/6/2009	0:00:06
11/6/2009 10:11	11/6/2009	0:00:04
11/6/2009 10:28	11/6/2009	--:--:--
11/6/2009 11:34	11/6/2009	0:00:05
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11/7/2009 14:55	11/7/2009	0:11:54
11/7/2009 21:24	11/7/2009	0:03:29
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11/29/2009 18:12	11/29/2009	0:05:30
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12/1/2009 12:09	12/1/2009	0:00:04
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12/1/2009 12:10	12/1/2009	0:27:48
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12/1/2009 20:53	12/1/2009	0:13:44
12/2/2009 11:31	12/2/2009	0:33:51
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All redactions in this document are done pursuant to FOIA Exemption (b)(6)



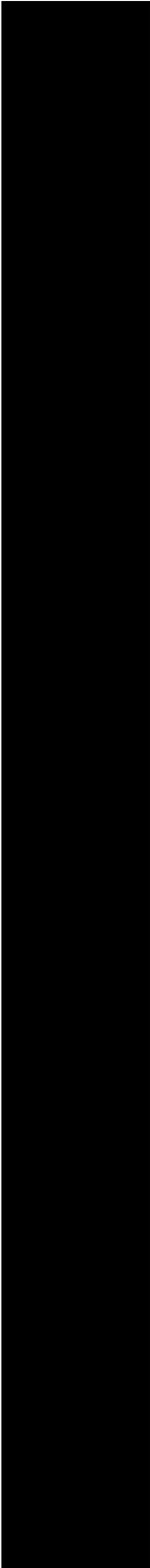
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12/8/2009 17:03	12/8/2009	0:06:14
12/4/2009 16:31	12/4/2009	0:00:08
12/8/2009 19:48	12/8/2009	0:00:14
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12/7/2009 12:01	12/7/2009	0:30:29
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12/4/2009 16:44	12/4/2009	0:04:32
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1/5/2010 16:05	1/5/2010 --:--:--	
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All redactions in this document are done pursuant to FOIA Exemption (b)(6)



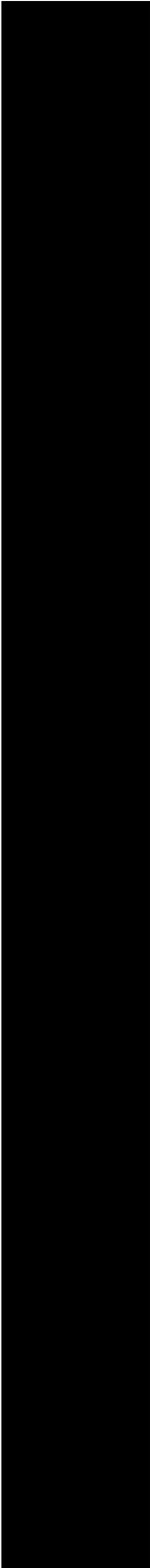
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1/10/2010 16:07	1/10/2010	0:04:07
1/10/2010 16:44	1/10/2010	0:04:43
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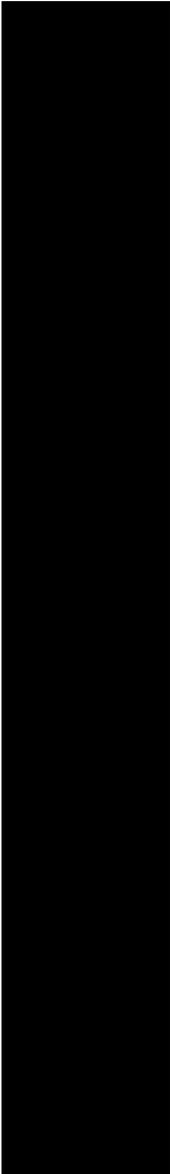
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September 10, 2020

Mr. Diego A. Soto, Esq.
Southern Poverty Law Center
400 Washington Avenue
Montgomery, AL 36104

VIA EMAIL to diego.soto@splcenter.org

Re: *Jenkins, et al. v. Miller, et al.*
Response to Letter of September 2, 2020

Dear Diego,

I am in receipt of your letter of September 2, 2020. I write to provide answers to your specific questions, update you as to the discovery from Timo's criminal case, and respond to your assertions with regard to the objections Timo raised to your discovery requests, in light of the Court's August 31, 2020 Order.

The Criminal Discovery

Initially, I want to clarify that, when Timo was arrested, he provided all materials relevant to the criminal proceeding and, by extension, this action to his criminal defense attorney, now-Judge Conrad. Timo did not retain copies of those materials and he did not receive any materials back. Judge Conrad's firm retained a physical copy of documents and CDs containing those materials, which is what we both have referred to as the criminal file. Judge Conrad's firm retained only a very small subset of materials relating to Timo's criminal proceeding in electronic form and those documents were transferred to Timo's Pennsylvania counsel and then to my firm. The electronic documents contain only publicly available pleadings and documents, to which Plaintiffs likely have access (or, in fact, possess) and two additional documents: one is subject to Timo's Fifth Amendment privilege and one contains Judge Conrad's work product and is therefore subject to that privilege. Otherwise, any and all documents associated with Timo's criminal proceeding and, therefore, responsive to Plaintiffs'

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discovery requests are located in that criminal file. Timo does not have independent access to, possession of, or control over those documents.

As you are well aware, there was some difficulty in arranging for the collection and transfer of the criminal file from Timo's past criminal proceeding. As I will explain, and as the attached Affidavit makes clear, the difficulty in securing the criminal discovery file had only just begun when I confirmed with you, back in December 2019, that I did not contest the production of the criminal discovery file. It is, in part, because of that difficulty that Timo agreed to assist you in your FOIA request.

On December 17, 2019, after I confirmed that we would produce the criminal discovery file, Timo personally picked up the file from now-Judge Conrad's former law firm and delivered them to his Pennsylvania counsel, Attorney James Smith, for transmission to my firm. On December 19, 2019, Attorney Smith mailed, via the United States Postal Service, the entire file to my firm. Attorney Smith did not retain copies of the materials contained in the file, nor did Judge Conrad's former firm. Although the file was supposed to have arrived here on December 24, 2019, it did not. On January 2, 2020, I notified Attorney Smith that the file had not arrived. Over the next few weeks and months, Attorney Smith made numerous attempts to locate the whereabouts of the file. Unfortunately, we have learned that the USPS determined that the file was "irretrievably" lost in transit by the United States Postal Service. Therefore, the only copy of the criminal discovery—except that kept by the government and which may be produced pursuant to your FOIA request—is currently lost. Accordingly, I can confirm that Timo does not have possession, custody, or control over the criminal discovery. If he does come into such possession, custody, or control, we will produce the criminal file without delay.

In addition to any reasonable efforts we may be able to make to locate and produce the criminal discovery file, if there are any reasonable efforts Timo can make to aid in your pending FOIA request, please let me know.

Additional Responsive Documents

For responses to the assertions you make with regard to the production of additional responsive documents, as well as the narrowed requests noted in your letter, please see Timo's Answers to your First Set of Requests for Production, which we have produced earlier today.

Timo's Fifth Amendment Privilege

Timo originally invoked his Fifth Amendment privilege through informal communications before asserting it in his Initial Disclosures and, subsequently, in pleadings filed with the Court. He did not waive that constitutional privilege. A party to a civil proceeding is not obligated to raise the privilege against self-incrimination to individual discovery requests within the specified timeframe. Rather, a party is entitled to raise that constitutional privilege at any time. This is due to the constitutional nature of that privilege, permitting "a civil litigant [to] legitimately use the Fifth Amendment to avoid having to answer inquiries *during any phase of the discovery process.*" *United States v. Certain Real Property and Premises Known as 4003-*

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4005 5th Ave., Brooklyn, N.Y., 55 F.3d 78, 82 (2d Cir. 1995) (emphasis added). Additionally, and more fundamentally, “litigants do not have a right to discovery of privileged matters” *in the first instance*. See *id.*; see also Fed. R. Civ. P. 26(b)(1) (“Parties may obtain discovery regarding any *nonprivileged* matter . . .”) (emphasis added)).

In short, Timo could not have waived his Fifth Amendment privilege, absent bad faith and extraordinary prejudice to the requesting party (issues not present here), especially with regard to responses to discovery requests that are, as here, rendered by his counsel and not, as with interrogatories, rendered himself, under oath. See *Brock v. Gerace*, 110 F.R.D. 58, 63-64 (D.N.J. 1986) (where the Fifth Amendment privilege was asserted as a blanket objection to interrogatories and production requests, was not invoked pursuant to the Rules of Civil Procedure, was raised by the party’s counsel in a letter to opposing counsel, where no material prejudice had befallen the opposing party, but where the responding party himself had not personally invoked the privilege, stating that “[t]he protection afforded by the Fifth Amendment is fundamental to our system of ordered liberties” and holding that the privilege was not waived despite its tardy invocation); *United States v. British American Tobacco Ltd.*, 387 F.3d 884, 890-91 (D.C. Cir. 2004) (“As the federal rules, case law and commentators suggest, waiver of privilege is a serious sanction most suitable for cases of unjustified delay, inexcusable conduct, and bad faith.” (quotations omitted)); *Bruner v. Midland Funding, LLC*, 2018 WL 2946401, at *3 (W.D. Okla. June 12, 2018) (“All objections [to interrogatories and production requests] are waived, *except a claim of privilege*.” (emphasis added)); *Johnson v. New Destiny Christian Center Church, Inc.*, 2016 WL 11586554, at *1 (M.D. Fla. Nov. 22, 2016) (“When a party fails to timely serve answers and responses to written discovery requests under Federal Rules of Civil Procedure 33 and 34, the party waives any objections they may have to the discovery *except objections based upon a recognized privilege from discovery*.” (emphasis added)); *Vesom v. Atchison Hosp. Ass’n*, 2005 WL 8160822, at *2 (D. Kan. May 12, 2005) (stating that the court “obviously” prefers not to find a waiver of privilege and finding no such waiver, even where the court “found massive, significant problems” with the responding party’s discovery failures).

Accordingly, the constitutional nature of Timo’s Fifth Amendment privilege against self-incrimination precludes some technical waiver-by-omission, particularly where Plaintiffs had no right to discovery of such matters in the first instance, where that privilege was invoked both informally and formally (in pleadings submitted to the Court), and where no material prejudice befalls Plaintiffs.

Additionally, although the Court appeared to misunderstand the scope of discovery Plaintiffs sought, the Fifth Amendment privilege is certainly triggered as to any documents requested by Plaintiffs that are not contained in the existing criminal discovery file and which pertain to conduct beyond that for which Timo pleaded guilty. As you recognized in your letter, Plaintiffs’ claims encompass conduct that extends beyond September 2009, when Lisa Miller and Isabella Miller-Jenkins left the United States. As you know, the crime for which Timo pleaded guilty relates to an offense that ended in September 2009. See Doc. 439.18 (Attachment to Plaintiffs’ Motion for Partial Summary Judgment, stating an “Offense Ended” date of September 2009). Both Plaintiffs’ Revised Second Amended Complaint and Plaintiffs’ discovery requests clearly seek to implicate Timo in, and concern documents relating to, conduct

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after that “Offense Ended” date. *See, e.g.*, Doc. 223, at ¶¶ 64-65 (Complaint, alleging that Lisa Miller intentionally held Isabella Miller-Jenkins in Nicaragua from January 1, 2010 to the present and that, in part, Timothy Miller assisted her in doing so); Doc. 473.1 (Plaintiffs’ discovery requests, which seek to acquire information beyond September 2009, both implicitly (“8. All communications with Defendant Lisa Miller”) and explicitly (“19. All communications on November 20, 2009”). And, of course, your letter indicates that Plaintiffs do, indeed, seek documents above and beyond those that may be contained in the criminal discovery file.

Timo is confident that, when the Court re-examines the merit of Timo’s Fifth Amendment privilege in light of the clarified scope of the discovery Plaintiffs seek, it will find that Timo has demonstrated a risk of future self-incrimination related to conduct extending beyond the “Offense Ended” date for the crime to which he pleaded guilty.

Without waiving this privilege—or the objections stated in response to Plaintiffs’ individual requests—I note again that, when Timo was arrested, he provided all relevant documents in his possession, control, or custody (including documents that may relate to this civil action) to his criminal defense attorney. He did not retain copies of those documents. As noted, the only documents kept by Judge Conrad’s firm in electronic format, and transferred to my firm, are publicly available documents and pleadings, as well as two documents subject to privilege. As such, any non-privileged documents which may be responsive to Plaintiffs’ requests, and are not already in Plaintiffs’ possession, are likely found in the criminal file or in the discovery that you are seeking to obtain pursuant to FOIA. Timo asserts his Fifth Amendment privilege only to material that was not exchanged as discovery in the criminal proceeding, which may exist and/or may be discovered in the future, and which may fuel a potential prosecution for a crime arising out of events beyond September 2009.

Should you have any questions about the above, or if you would like to discuss the reasonable actions Timo will, or can, take to locate or produce the discovery from his prior criminal proceeding, please let me know.

Very truly yours,



Michael J. Tierney

MJT/mge
Enc. (2)

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

JANET JENKINS, et al.,

Plaintiffs,

v.

KENNETH L. MILLER, et al.,

Defendants.

No. 2:12-cv-184-WKS

**PLAINTIFFS' FIRST SET OF REQUESTS FOR PRODUCTION
TO DEFENDANT TIMOTHY MILLER**

Plaintiffs Janet Jenkins and Isabella Miller-Jenkins, pursuant to Federal Rule of Civil Procedure 34, request that Defendant Timothy Miller produce the following documents and things for inspection and copying at the offices of the Southern Poverty Law Center, c/o Beth D. Jacob, 400 Washington Avenue, Montgomery, Alabama 36104, within thirty days of receipt.

DEFINITIONS

1. "Aid" means help or assistance in any form, including but not limited to gifts, loans, advice, recommendations, suggestions, ideas, introductions, favors, and provision of services.

2. "Communication" means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise), including but not limited to telephone calls, voice recordings, emails, text messages, letters, postcards, notes, cards, instant messages, text chats, voice chats, tweets, notes, memoranda, speeches, lectures, seminars, conferences, and conversations.

3. "Complaint" means the Revised Second Amended Complaint and Demand for Trial by Jury, ECF 223, filed in this case on May 4, 2017.

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4. “Concerning” means relating to, referring to, describing, evidencing, or constituting.

5. “Court Orders” means any order issued or expected to be issued by a state court of Vermont or Virginia concerning Plaintiff Isabella Miller-Jenkins, including but not limited to any order issued in the Vermont Proceedings, including but not limited to the Custody Transfer Order, or in the Virginia Proceedings.

6. “Custody Transfer Order” means the November 20, 2009 order by the Vermont Superior Court, Rutland County Division, in *Miller-Jenkins v. Miller-Jenkins*, No. 454-11-03 Rddm (Vt. Super. Ct. Rutland Fam. Div.), ordering, among other things, that Plaintiff Janet Jenkins have sole physical and legal custody of Plaintiff Isabella Miller-Jenkins and that transfer of Plaintiff Isabella Miller-Jenkins occur at the home of Plaintiff Janet Jenkins’s parents in Virginia on January 1, 2010, at 1:00 p.m.

7. “Dispute” means the disagreement between Plaintiff Janet Jenkins and Defendant Lisa Miller over parental rights concerning Plaintiff Isabella Miller-Jenkins, including but not limited to the Vermont Proceedings and the Virginia Proceedings.

8. “Document” is defined to be synonymous in meaning and equal in scope to the usage of the term “documents or electronically stored information” (ESI) in Federal Rule of Civil Procedure 34(a)(1)(A). A draft or nonidentical copy is a separate document within the meaning of this term.

9. “Identify,” when referring to a person, means to produce documents sufficient to show the person’s full name, present or last known address, present or last known phone number, present or last known email address, and when referring to a natural person, the present or last known place of employment.

10. “Identify,” when referring to documents, means to produce documents sufficient to show the type of document, general subject matter, date of the document, and authors, addressees, and recipients.

11. “Identify,” when referring to social media, means to produce documents sufficient to show the name of the social media platform; the Uniform Resource Locator for the platform; any names, handles, usernames, accounts, or profiles, including but not limited to any account or identification number; and the owner of the account.

12. “Isabella Miller-Jenkins” means Plaintiff Isabella Miller-Jenkins, regardless of the name used by her or to refer to her, including but not limited to the name “Lydia,” who was the minor child subject of the Custody Transfer Order.

13. “Lisa Miller” means Defendant Lisa Miller, regardless of the name used by her or to refer to her, including but not limited to the names “Lisa Miller-Jenkins” and “Sarah,” who was a party in the Vermont Proceedings and the Virginia Proceedings and who is a parent of Plaintiff Isabella Miller-Jenkins.

14. The terms “Plaintiff” and “Defendant,” as well as a party’s full or abbreviated name or a pronoun referring to a party, mean the party, regardless of the name used by the party or to refer to the party, and where applicable, the party’s successors and predecessors in interest, and the party’s current and former officers, directors, employees, partners, parents, subsidiaries, affiliates, agents, consultants, and others purporting to act on the party’s behalf. This definition is not intended to impose a discovery obligation on any person who is not a party to the litigation.

15. “Person” means any natural person or any legal entity, including but not limited to any governmental entity or association or any business entity or association, including but not limited to its successors and predecessors in interest, and its current and former officers,

directors, employees, partners, parents, subsidiaries, affiliates, agents, consultants, and others purporting to act on its behalf.

16. “Requests” means the Requests for Production set forth in this document.

17. “Vermont Proceedings” means any Vermont state court case concerning Plaintiff

Isabella Miller-Jenkins, including but not limited to:

- a. *Miller-Jenkins v. Miller-Jenkins*, No. 2007-271 (Vt.);
- b. *Miller-Jenkins v. Miller-Jenkins*, No. 2009-473 (Vt.);
- c. *Miller-Jenkins v. Miller-Jenkins*, No. 454-11-03 Rddm (Vt. Super. Ct. Rutland Fam. Div.); and
- d. *Miller-Jenkins v. Miller-Jenkins*, Nos. 2004-443, 2005-030 (Vt.).

18. “Virginia Proceedings” means any Virginia state court case concerning Plaintiff

Isabella Miller-Jenkins, including but not limited to:

- a. *Jenkins v. Miller*, No. CL09000723-00 (Va. Cir. Ct. Frederick Cty.);
- b. *Miller v. Jenkins*, No. JJ019920-01-00 (Va. Juv. & Dom. Rel. Dt. Ct. Bedford Cty.);
- c. *Miller-Jenkins v. Miller-Jenkins*, No. 070933 (Va. Ct. App.);
- d. *Miller v. Jenkins*, No. 0705-09-4 (Va. Ct. App.);
- e. *Miller-Jenkins v. Miller-Jenkins*, No. CH04-280 (Va. Cir. Ct. Frederick Cty.);
- f. *Miller-Jenkins v. Miller-Jenkins*, No. CH05-000336-00 (Va. Cir. Ct. Frederick Cty.); and
- g. *Miller-Jenkins v. Miller-Jenkins*, No. JJ018902-01-00 (Va. Juv. & Dom. Rel. Dt. Ct. Frederick Cty.).

19. “You” and “Your” refer to the party to whom this set of requests is directed, regardless of the name used by the party or to refer to the party, and where applicable, the party’s successors and predecessors in interest, and the party’s current and former officers, directors, employees, partners, parents, subsidiaries, affiliates, agents, consultants, and others purporting to act on the party’s behalf. This definition is not intended to impose a discovery obligation on any person who is not a party to the litigation.

20. The singular form of a noun or pronoun includes the plural form of the noun or pronoun, and vice versa. The gendered form of a noun or pronoun includes all gendered and nongendered forms of the noun or pronoun.

21. The past tense includes the present tense and vice versa, except where the clear meaning would be distorted.

22. The term “or” means “and” and vice versa to bring within the scope of these Requests all documents or ESI that would be excluded absent this definition.

INSTRUCTIONS

1. Provide all information and documents in Your possession, custody, or control in response to each Request.

2. For each Request that seeks production of documents, produce each such document in its entirety and all drafts and non-identical copies of each document.

3. If You are able or willing to provide only part of the information and documents sought by a Request, provide that partial information and documentation and specify in writing the reason for Your inability or unwillingness to provide the remainder.

4. When responding to these Requests, state in writing as to each Request either that:
- a. there are such documents and they will be produced;
 - b. there are such documents and that they already have been produced;

- c. there are such documents, but You refuse to produce them because of a claim of privilege or for some other identified reason; or
- d. the documents requested do not exist.

5. For every objection to a Request, specify in writing the grounds for objecting to the Request, including the reasons, whether any responsive materials are being withheld on the basis of that objection, and the parts of the documents being withheld on the basis of that objection. Produce the parts of the document not being withheld on the basis of an objection.

6. For every document or part of a document withheld from production because of an assertion of privilege, identify the nature of the claimed privilege (including work product) and, if the privilege is governed by state law, identify the state's privilege rule being invoked.

7. If any document sought by these Requests has been destroyed or no longer exists, state as to each such document its date, authors, recipients, contents, and the date and circumstances of its destruction or ceasing to exist.

8. If any answer to these Requests is made upon information and belief, so state and set forth and identify the sources of such information and belief. If You lack the knowledge necessary to answer any of these Requests, so state.

9. For every document or part of document withheld from production, provide the following information with respect to each such document, in a single privilege log in a Microsoft Excel Worksheet (.xlsx) file with clearly marked rows for each document and ESI withheld and clearly marked columns for each descriptor used:

- a. First Bates number;
- b. Last Bates number;
- c. Type of document (for example, memorandum, email, letter);

- d. Subject matter;
- e. Date;
- f. Title;
- g. Authors;
- h. Recipients;
- i. Relationship of authors and recipients to each other;
- j. Person asserting the privilege; and
- k. Nature of the claimed privilege (including work product) and, if the privilege is governed by state law, the state's privilege rule being invoked.

10. If You cannot fully and completely answer any of these Requests, separately respond to each such Request to the extent possible, stating with specificity the reasons for Your inability to answer the remainder, the substance of Your knowledge, information, and belief concerning the subject matter of the unanswered portion, and the steps taken to locate any responsive documents.

11. Furnish all responsive documents available to You or in your custody or control.

12. Unless otherwise stated in a Request, the applicable timeframe begins on December 18, 2000.

13. These Requests are continuing. If, after responding to these Requests, You obtain or become aware of any additional facts, information, or documents responsive to these Requests, supplement or correct Your response as required by the Federal Rules of Civil Procedure and Local Rules.

14. Plaintiffs reserve the right to serve additional Requests.

REQUESTS FOR PRODUCTION

1. All documents disclosed or identified in Your initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(ii).

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Without waiving this objection, it is stated that no such documents were disclosed or identified and therefore, no responsive documents exist.

2. All documents that support Your defenses to the claims alleged in the Complaint.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that any responsive documents

are already in the possession of Plaintiffs and Timo does not currently have possession, control, or custody of any further responsive documents.

3. All documents that contradict Your defenses to or that support the claims alleged in the Complaint.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that no responsive documents, not already in the custody of Plaintiffs, exist.

4. All documents and communications concerning Plaintiff Janet Jenkins.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. In fact, the Court has previously held this request to be unduly burdensome. See Doc. 395. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

5. All documents and communications concerning Plaintiff Isabella Miller-Jenkins.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. In fact, the Court has previously held this request to be unduly burdensome. See Doc. 395. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

6. All documents and communications concerning Defendant Lisa Miller.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file

or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. In fact, the Court has previously held this request to be unduly burdensome. See Doc. 395. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

7. All communications with Plaintiff Isabella Miller-Jenkins.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

8. All communications with Defendant Lisa Miller.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding.

Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

9. Documents sufficient to identify and disclose all telephone numbers; email addresses; international calling services, including but not limited to PennyTalk and VIVOfone; electronic means of communication; communications applications accounts, including but not limited to WhatsApp, Viber, and Signal; and social media accounts or applications, including but not limited to Facebook, Twitter, Snapchat, and Instagram, used by Defendant Lisa Miller from 2002 to date.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

10. Documents sufficient to Identify and disclose all telephone numbers; email addresses; international calling services, including but not limited to PennyTalk and VIVOfone; electronic means of communication; communications applications accounts, including but not limited to WhatsApp, Viber, and Signal; and social media accounts or applications, including but not limited to Facebook, Twitter, Snapchat, and Instagram, used by or on behalf of Plaintiff Isabella Miller-Jenkins from 2002 to date.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

11. All communications with zeusdesfor@aol.com concerning the Dispute; Defendant Lisa Miller's whereabouts from September 20, 2009, to date; Plaintiff Isabella Miller-Jenkins's whereabouts from September 20, 2009, to date; the Beachy Amish Mennonites; or Nicaragua.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

12. All communications with god1ofchild@live.com concerning the Dispute;

Defendant Lisa Miller's whereabouts from September 20, 2009, to date; Plaintiff Isabella Miller-Jenkins's whereabouts from September 20, 2009, to date; the Beachy Amish Mennonites; or Nicaragua.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

13. All communications with the Skype account with the username childofjesus1 concerning the Dispute; Defendant Lisa Miller's whereabouts from September 20, 2009, to date; Plaintiff Isabella Miller-Jenkins's whereabouts from September 20, 2009, to date; the Beachy Amish Mennonites; or Nicaragua.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

14. All communications with the Facebook account with identification number 1539940246 concerning the Dispute; Defendant Lisa Miller's whereabouts from September 20, 2009, to date; Plaintiff Isabella Miller-Jenkins's whereabouts from September 20, 2009, to date; the Beachy Amish Mennonites; or Nicaragua.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

15. All documents and communications concerning names, aliases, or identities used by Defendant Lisa Miller.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

16. All documents and communications concerning names, aliases, or identities used by Plaintiff Isabella Miller-Jenkins.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

17. All documents and communications concerning the Dispute.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising

after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

18. All documents and communications concerning the Court Orders.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

19. All communications on November 20, 2009.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any

additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

20. All documents and communications concerning the Protect Isabella Coalition.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, to the extent they exist.

21. All documents and communications concerning the website

www.protectisabella.com.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which

Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

22. All documents and communications concerning the Only One Mommy Facebook group, identification number 81022155363.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

23. All documents and communications concerning

<http://imgodschild.wordpress.com>.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

24. All documents and communications concerning

http://works.bepress.com/rena_lindevaldsen/ concerning the Dispute; Defendant Lisa Miller's

whereabouts from September 20, 2009, to date; Plaintiff Isabella Miller-Jenkins's whereabouts from September 20, 2009, to date; the Beachy Amish Mennonites; or Nicaragua.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a

criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

25. All documents and communications concerning <http://www.debbiethurman.com/> concerning the Dispute; Defendant Lisa Miller's whereabouts from September 20, 2009, to date; Plaintiff Isabella Miller-Jenkins's whereabouts from September 20, 2009, to date; the Beachy Amish Mennonites; or Nicaragua.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

26. All documents concerning and communications concerning <http://www.theformers.wordpress.com/> concerning the Dispute; Defendant Lisa Miller's

whereabouts from September 20, 2009, to date; Plaintiff Isabella Miller-Jenkins's whereabouts from September 20, 2009, to date; the Beachy Amish Mennonites; or Nicaragua.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

27. All documents and communications concerning <https://lezgetreal.com/> concerning the Dispute; Defendant Lisa Miller's whereabouts from September 20, 2009, to date; Plaintiff Isabella Miller-Jenkins's whereabouts from September 20, 2009, to date; the Beachy Amish Mennonites; or Nicaragua, and any visits or posts by Defendant Lisa Miller.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a

criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

28. All documents and communications concerning <https://www.lifesitenews.com/> concerning the Dispute; Defendant Lisa Miller's whereabouts from September 20, 2009, to date; Plaintiff Isabella Miller-Jenkins's whereabouts from September 20, 2009, to date; the Beachy Amish Mennonites; or Nicaragua.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

29. All communications with Matthew Cullinan Hoffman concerning the Dispute; Defendant Lisa Miller's whereabouts from September 20, 2009, to date; Plaintiff Isabella Miller-

Jenkins's whereabouts from September 20, 2009, to date; the Beachy Amish Mennonites; or Nicaragua.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

30. Documents sufficient to show Defendant Lisa Miller's whereabouts from September 13, 2003, through September 19, 2009.

Objection. Timo objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. Timo does not, at this time, have possession, custody, or control of this file or, independently, of the documents found therein.

31. Documents sufficient to show Plaintiff Isabella Miller-Jenkins's whereabouts from April 16, 2002, through September 19, 2009.

Objection. Timo objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks

documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. Timo does not, at this time, have possession, custody, or control of this file or, independently, of the documents found therein.

32. All documents, regardless of when created or dated, concerning Defendant Lisa Miller's whereabouts from September 20, 2009, to date.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

33. All documents, regardless of when created or dated, concerning Plaintiff Isabella Miller-Jenkins's whereabouts from September 20, 2009, to date.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file

or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

34. All documents and communications concerning Your whereabouts on September 20, 2009, September 21, 2009, and September 22, 2009.

Objection. Timo objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. Timo does not, at this time, have possession, custody, or control of this file or, independently, of the documents found therein.

35. All communications on September 20, 2009, September 21, 2009, and September 22, 2009.

Objection. Timo objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. Timo does not, at this time, have possession, custody, or control of this file or, independently, of the documents found therein.

36. All documents and communications concerning events that happened, or were planned or expected to happen, on September 20, 2009, September 21, 2009, and September 22,

2009.

Objection. Timo objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. Timo does not, at this time, have possession, custody, or control of this file or, independently, of the documents found therein.

37. All documents and communications concerning Nicaragua.

Objection. Documents responsive to this request—as amended by Plaintiffs' letter of September 2, 2020 pursuant to the Court's August 31, 2020 Order—to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request remains vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

38. All documents and communications concerning the Beachy Amish Mennonite Church in Nicaragua.

Objection. Documents responsive to this request—as amended by Plaintiffs' letter of September 2, 2020 pursuant to the Court's August 31, 2020 Order—to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and

which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request remains vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

39. All communications with the Beachy Amish Mennonite Church in Nicaragua.

Objection. Documents responsive to this request—as amended by Plaintiffs' letter of September 2, 2020—to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request remains vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of

Plaintiffs, to the extent they exist.

40. All documents and communications concerning any Aid directly or indirectly given to Defendant Lisa Miller concerning her compliance or noncompliance with the Court Orders.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

41. All documents and communications concerning any Aid directly or indirectly given to Defendant Lisa Miller or Plaintiff Isabella Miller-Jenkins concerning their departure from 203B Greentree Drive, Forest, Virginia, in September 2009, travel to Canada, departure from the United States, travel to Nicaragua, living in Nicaragua, or remaining in Nicaragua.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file

or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

42. All documents and communications concerning Defendant Lisa Miller's efforts to remain undetected by United States authorities, including but not limited to Aid directly or indirectly given to her to allow her to avoid such detection.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

43. All documents and communications concerning jesman21@gmail.com.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

44. All communications with jesman21@gmail.com.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of

Plaintiffs, to the extent they exist.

45. All communications with Jessica Fehr.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

46. All documents and communications concerning 203B Greentree Drive, Forest, Virginia, including but not limited to payment of rent and the removal and storage of personal property.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby

asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

47. All communications on November 8, 2009, November 9, 2009, November 10, 2009, November 11, 2009, November 12, 2009, and November 13, 2009.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

48. All documents and communications concerning events that happened, or were planned or expected to happen, on November 8, 2009, November 9, 2009, November 10, 2009, November 11, 2009, November 12, 2009, and November 13, 2009.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which

Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

49. All communications with Anthony Phelps, the landlord of 203B Greentree Drive, Forest, Virginia.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

50. Documents sufficient to Identify all telephone numbers, including but not limited to landlines and cellular lines or applications, used by You in 2009 to date.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

51. Documents sufficient to Identify all email addresses used by You in 2009 to date.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

52. Documents sufficient to Identify all international calling services and the accounts

or numbers, including but not limited to PennyTalk and VIVOphone, used by You in 2009 to date.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

53. Documents sufficient to Identify social media and electronic means of communication used by You in 2009 to date.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

54. All communications with the Facebook account of Lisa Wall, identification number 1436421487, concerning the Dispute; Defendant Lisa Miller's whereabouts from September 20, 2009, to date; Plaintiff Isabella Miller-Jenkins's whereabouts from September 20, 2009, to date; the Beachy Amish Mennonites; or Nicaragua.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

55. All communications with wall4america@netzero.net concerning the Dispute; Defendant Lisa Miller's whereabouts from September 20, 2009, to date; Plaintiff Isabella Miller-Jenkins's whereabouts from September 20, 2009, to date; the Beachy Amish Mennonites; or Nicaragua.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

56. All communications with the Facebook account of Beth Ehrhorn, identification number 1072853392, concerning the Dispute; Defendant Lisa Miller's whereabouts from September 20, 2009, to date; Plaintiff Isabella Miller-Jenkins's whereabouts from September 20, 2009, to date; the Beachy Amish Mennonites; or Nicaragua.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

57. All communications with behrhorn@aol.com concerning the Dispute; Defendant Lisa Miller's whereabouts from September 20, 2009, to date; Plaintiff Isabella Miller-Jenkins's whereabouts from September 20, 2009, to date; the Beachy Amish Mennonites; or Nicaragua.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

58. All communications with the Facebook account of Sarah Bloedorn, identification number 1371510997, concerning the Dispute; Defendant Lisa Miller's whereabouts from September 20, 2009, to date; Plaintiff Isabella Miller-Jenkins's whereabouts from September 20, 2009, to date; the Beachy Amish Mennonites; or Nicaragua.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding.

The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

59. All communications with qtjars@gmail.com concerning the Dispute; Defendant Lisa Miller's whereabouts from September 20, 2009, to date; Plaintiff Isabella Miller-Jenkins's whereabouts from September 20, 2009, to date; the Beachy Amish Mennonites; or Nicaragua.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

60. All communications with timjomiller@gmail.com concerning the Dispute; Defendant Lisa Miller's whereabouts from September 20, 2009, to date; Plaintiff Isabella Miller-Jenkins's whereabouts from September 20, 2009, to date; the Beachy Amish Mennonites; or Nicaragua.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

61. All communications with kingdomseeker1@gmail.com concerning the Dispute; Defendant Lisa Miller's whereabouts from September 20, 2009, to date; Plaintiff Isabella Miller-Jenkins's whereabouts from September 20, 2009, to date; the Beachy Amish Mennonites; or Nicaragua.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which

Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Just as it is unduly burdensome and not relevant to produce all documents regarding one's church or the country one is residing in, see Doc. 554, p. 8, it is unduly burdensome and not relevant to require production of all communications regarding one's church or country of residence. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

62. All communications with millersofwaslala@gmail.com concerning the Dispute;

Defendant Lisa Miller's whereabouts from September 20, 2009, to date; Plaintiff Isabella Miller-Jenkins's whereabouts from September 20, 2009, to date; the Beachy Amish Mennonites; or Nicaragua.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Just as it is unduly burdensome and not relevant to produce all documents regarding one's church or the country one is residing in, see Doc. 554, p. 8, it is unduly burdensome and not relevant to require production of communications with family members regarding one's church or country of residence. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive and relevant documents, not already in the custody of Plaintiffs, to the extent they exist.

63. All communications with philipz@responseunlimited.com concerning the Dispute; Defendant Lisa Miller's whereabouts from September 20, 2009, to date; Plaintiff Isabella Miller-Jenkins's whereabouts from September 20, 2009, to date; the Beachy Amish Mennonites; or Nicaragua.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

64. All documents and communications concerning Your opinions or beliefs concerning same-sex marriage, same-sex civil unions, or same-sex relationships.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is irrelevant, vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

65. All documents and communications concerning Your opinions or beliefs concerning whether homosexual persons should have custody of or visitation with children.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is irrelevant, vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product

privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

66. All documents and communications concerning Your opinions or beliefs concerning the relative supremacy of secular law (including but not limited to court orders and court opinions) over religion, morality, ethics, or conscience.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is irrelevant, vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

67. All documents and communications concerning Your opinions or beliefs concerning the relative supremacy of religion, morality, ethics, or conscience over secular law (including but not limited to court orders and court opinions).

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as

one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is irrelevant, vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

68. All documents and communications concerning Your opinions or beliefs concerning compliance or noncompliance with the Court Orders.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is irrelevant, vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

69. All documents and communications concerning Your opinions or beliefs concerning whether Plaintiff Janet Jenkins should have custody of or visitation with Plaintiff Isabella Miller-Jenkins.

Objection. Documents responsive to this request, to the extent they exist, are located in the discovery file associated with Timo's prior criminal proceeding. The sole documents to which Timo has access and which may also be found in this file are copies of publicly available documents and pleadings to which Plaintiffs already have access and would therefore be duplicative, as well as one document protected by the work product and/or attorney-client privilege and one document subject to the Fifth Amendment privilege. Timo does not, at this time, have possession, custody, or control of the remainder of this file or, independently, of the documents found therein. To the extent any additional responsive documents exist, disclosure of same is subject to Timo's Fifth Amendment privilege against self-incrimination, as such disclosure could provide the United States government with evidence to support a criminal prosecution of Timo for conduct associated with an offense arising after the end date of the offense for which he pleaded guilty. Timo hereby asserts his Fifth Amendment privilege to such documents.

Timo further objects on the grounds that this request is irrelevant, vague, overbroad, and unduly burdensome. Timo also objects to the extent this request seeks documents protected by the attorney-client and work product privileges.

Without waiving these objections, it is stated that Timo does not have possession, custody, or control of any responsive documents, not already in the custody of Plaintiffs, to the extent they exist.

Dated September 10, 2020

Respectfully submitted,
Timothy D. Miller

By his attorneys,
WADLEIGH, STARR & PETERS, P.L.L.C.

By /S/ Michael J. Tierney
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CERTIFICATE OF SERVICE

I hereby certify that, on this date, the foregoing document was served on the following
counsel of record by email:

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

JANET JENKINS, et al.,

Plaintiffs,

v.

No. 2:12-cv-184-WKS

KENNETH L. MILLER, et al.,

Defendants.

**DECLARATION OF DIEGO A. SOTO IN SUPPORT OF
PLAINTIFFS' RESPONSE IN OPPOSITION TO
DEFENDANT TIMOTHY D. MILLER'S MOTION TO RECONSIDER COURT'S
ORDER OF AUGUST 31, 2020 (DOC. 554)
AND CROSS-MOTION FOR SANCTIONS**

I, Diego A. Soto, declare under penalty of perjury that the following is true and correct:

1. I am a Staff Attorney at the Southern Poverty Law Center, which represents Plaintiffs Janet Jenkins and Isabella Miller-Jenkins in this case.
2. On January 9, I received a phone call from Defendant Timothy Miller's attorney Michael Tierney but was unable to receive a voicemail due to a technical error. I did not receive from Tierney any follow-up emails, text messages, faxes, or phone calls to either of my phone numbers, which were in my email signature, or to my employer's main telephone line, which is among my contact information in this case.
3. On March 2, Tierney emailed me Defendant's signed release, and I promptly submitted a FOIA request for all records produced in discovery in Defendant's criminal cases.
4. Before September 10, including when he and I spoke by phone on January 27, Tierney did not disclose that Defendant's criminal defense firm had his file, that Defendant himself picked it up and delivered it to his Pennsylvania attorney, James Smith, that the firm retained a digital copy of only a very small subset of the documents, that the file contained the

criminal discovery, that Smith mailed the file to Tierney, that Smith did not make a copy of the contents, that the package was delivered to Tierney without contents on January 11, 2020, or that the United States Postal Service had concluded the package is irretrievably lost.

5. Exhibit 1 is a true and authentic copy of emails between me and Tierney.

6. Exhibit 2 is a true and authentic copy of emails between me and Assistant United States Attorney Jason Turner.

7. Exhibit 3 is a true and authentic copy of a June 12, 2020 letter from Kevin Krebs, Assistant Director, Freedom of Information and Privacy Staff, Executive Office for U.S. Attorneys, U.S. Department of Justice, to me responding to my FOIA request.

8. Exhibit 4 is a true and authentic copy of a September 10, 2020 letter from Tierney to me.

9. Exhibit 5 is a true and authentic copy of Defendant's responses and objections to Plaintiffs' requests for production, served on September 10, 2020.

Executed on October 1, 2020

/s/ Diego A. Soto
Diego A. Soto
Counsel for Plaintiffs
Janet Jenkins and Isabella Miller-Jenkins