

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

UNITED STATES OF AMERICA

v.

**PATRICK MONTGOMERY and
BRADY KNOWLTON,**

Defendants.

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CASE NO. 21-cr-046 (RDM)


NOTICE OF FILING

The government requests that the attached discovery letters, dated September 14, 2021, be made part of the record in this case.

Respectfully submitted,

CHANNING D. PHILLIPS
Acting United States Attorney
D.C. Bar No. 415793

By:


Elizabeth C. Kelley
Assistant United States Attorney
D.C. Bar No. 105031
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U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

District of Columbia

*Judiciary Center
555 Fourth St., N.W.
Washington, D.C. 20530*

September 14, 2021

Brent Mayr, Esq.
5300 Memorial Dr., Suite 750
Houston, TX 77007

Ronald S. Sullivan, Jr., Esq.
Harvard Law School
Cambridge, MA 02138

Re: *United States v. Brady Knowlton*
Case Number: 21-cr-046

Dear Mr. Mayr and Mr. Sullivan:

This letter is to notify you of discovery that has been produced via the USAFx case folder. The new items are provided in a sub-folder labeled, "Montgomery – Fast Track Materials." You can find the materials here:

<https://usafx.box.com/s/yrjwammdw83ogu25lb099v1cze13ctlh>

Specifically, we are providing to you the same materials that we provided to co-defendant Patrick Montgomery as part of the "fast-track" discovery process. The materials provided are Bates stamped CAP04_000015371 to CAP04_000016142, as documented in the enclosed index.

Protective Order. These materials are subject to the agreed-up protective order issued in this case. Certain materials are designated Sensitive or Highly Sensitive as noted on the provided index. *Additionally, as explained in our July 16, 2021 letter, you have agreed to provide additional protections for the following type of materials to protect both personal identifying information ("PII") and other confidential information of Mr. Montgomery:*

- For documents containing PII of Mr. Montgomery, the materials will be treated as "sensitive."

- For other confidential information such as call logs or location history, you will treat it as “highly sensitive.”

If you have any questions about whether a document would fall into one of these additional categories, please do not hesitate to reach out.

Manner of Production. Please be sure to download the entire USAFx folder, including all subfolders and files contained within the subfolders exactly as it was provided **immediately** upon receipt to your own storage media. The USAFx materials will be deleted automatically in 60 days.

This production contains the following:

- A “PDF” folder containing the discovery in searchable PDF format.
- A “NATIVE” folder of documents that cannot be converted to PDFs such as audio/video recordings. Files that could not be converted to PDF will have a “placeholder” in the “PDF” folder that references the native file. You will find the referenced file by navigating to the corresponding Bates number in the NATIVE folder.
- An index of the production, provided in both Excel and Adobe PDF formats.

If you would like this production in load files for creating a document review database (e.g., Relativity) please let me know and we will provide load files.

The discovery is unencrypted. Please contact me if you have any issues accessing the information, and to confer regarding pretrial discovery as provided in Fed. R. Crim. P. 16.1.

Technical Assistance. Assistant Federal Public Defenders with technical discovery questions or those who are in need of assistance managing the discovery in this case can contact Kelly Scribner (kelly_scribner@fd.org) with the Defender Services Office - National Litigation Support Team. While Ms. Scribner is not specifically tasked with assisting retained counsel, she is willing to talk with you about your discovery issues on a limited basis. However, the National Litigation Support Team typically cannot support retained defense counsel as the National Litigation Support Team is funded to assist CJA panel counsel and Federal Public Defender offices appointed through the CJA Act.

I will forward additional discovery as it becomes available. If you have any questions, please feel free to contact me.

Sincerely,

/s/ Elizabeth Kelley
ELIZABETH KELLEY
Assistant United States Attorney



U.S. Department of Justice

Channing D. Phillips
Acting United States Attorney

District of Columbia

*Judiciary Center
555 Fourth St., N.W.
Washington, D.C. 20530*

September 14, 2021

Dani Jahn, Esq.
Federal Public Defender for the District of Columbia
625 Indiana Ave., N.W., Suite 550
Washington, DC 20004

Re: *United States v. Patrick Montgomery*
Case Number: 21-cr-046

Dear Ms. Jahn:

This letter is to notify you of discovery that has been produced via the USAFx case folder. The new items are provided in a sub-folder labeled, "Knowlton – Fast Track Materials." You can find the materials here: <https://usafx.box.com/s/yrjwammdw83ogu25lb099v1cze13ctlh>

Specifically, we are providing to you the same materials that we provided to co-defendant Brady Knowlton as part of the "fast-track" discovery process. The materials provided are Bates stamped CAP04_000015371 to CAP04_000016142, as documented in the enclosed index.

Protective Order. These materials are subject to the agreed-up protective order issued in this case. Certain materials are designated Sensitive or Highly Sensitive as noted on the provided index. *Additionally, as explained in our July 16, 2021 letter, you have agreed to provide additional protections for the following type of materials to protect both personal identifying information ("PII") and other confidential information of Mr. Knowlton:*

- For documents containing PII of Mr. Knowlton, the materials will be treated as "sensitive."
- For other confidential information such as call logs or location history, you will treat it as "highly sensitive."

If you have any questions about whether a document would fall into one of these additional categories, please do not hesitate to reach out.

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I will forward additional discovery as it becomes available. If you have any questions, please feel free to contact me.

Sincerely,

/s/ Elizabeth Kelley
ELIZABETH KELLEY
Assistant United States Attorney