
From: Roger Roots
Sent: Monday, May 1, 2023 5:25 PM
To: Miller, Samantha (USADC); Emily Lambert; John Pierce
Cc: McCauley, Sean (USADC); Rummens, Brianna (USADC) [Contractor]
Subject: RE: 1:21-cr-00552-DLF USA v. THOMAS: Govt Preliminary Exhibit List

<https://www.dropbox.com/sh/89jyi3dhh8ag2b3/AABUwLZZoihxJ44w1FBGA26Oa?dl=0>

Here's the Dropbox link. I'll be adding more files as I get them transferred. Thanks

Respectfully,
Em Lambert
Client Advocate
John Pierce Law
P: (662) 665-1061
21550 Oxnard Street
3rd Floor PMB #172
Woodland Hills, CA 91367



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From: Miller, Samantha (USADC) <Samantha.Miller@usdoj.gov>
Sent: Sunday, April 30, 2023 6:18:54 PM
To: Emily Lambert <elambert@johnpiercelaw.com>; John Pierce <jpierce@johnpiercelaw.com>
Cc: Roger Roots <rroots@johnpiercelaw.com>; McCauley, Sean (USADC) <Sean.McCauley@usdoj.gov>; Rummens, Brianna (USADC) [Contractor] <Brianna.Rummens@usdoj.gov>
Subject: RE: 1:21-cr-00552-DLF USA v. THOMAS: Govt Preliminary Exhibit List

Noted, thank you.

—

Samantha R. Miller
Assistant United States Attorney
United States Attorney's Office | District of Columbia
Email: samantha.miller@usdoj.gov
Desk Tel: (202) 252-7014

From: Emily Lambert <elambert@johnpiercelaw.com>
Sent: Sunday, April 30, 2023 4:48 PM
To: Miller, Samantha (USADC) <SMiller1@usa.doj.gov>; John Pierce <jpierce@johnpiercelaw.com>
Cc: Roger Roots <rroots@johnpiercelaw.com>; McCauley, Sean (USADC) <SMcCauley@usa.doj.gov>; Rummens, Brianna (USADC) [Contractor] <BRummens@usa.doj.gov>
Subject: [EXTERNAL] RE: 1:21-cr-00552-DLF USA v. THOMAS: Govt Preliminary Exhibit List

Hi Samantha,

As an update, I'm working on transferring and uploading these files to a dropbox, and will send you the link by the end of the day. Thanks

Respectfully,
Em Lambert
Client Advocate
John Pierce Law
P: (662) 665-1061
21550 Oxnard Street
3rd Floor PMB #172
Woodland Hills, CA 91367



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From: [Miller, Samantha \(USADC\)](#)
Sent: Friday, April 28, 2023 4:28 PM
To: [Emily Lambert](#); [John Pierce](#)
Cc: [Roger Roots](#); [McCauley, Sean \(USADC\)](#); [Rummens, Brianna \(USADC\) \[Contractor\]](#)
Subject: RE: 1:21-cr-00552-DLF USA v. THOMAS: Govt Preliminary Exhibit List

Ms. Lambert, thank you. When can we expect to receive these files?

Thanks,

Samantha

—

Samantha R. Miller
Assistant United States Attorney
United States Attorney's Office | District of Columbia
Email: samantha.miller@usdoj.gov
Desk Tel: (202) 252-7014

From: Emily Lambert <elambert@johnpiercelaw.com>
Sent: Friday, April 28, 2023 2:13 PM
To: Miller, Samantha (USADC) <SMiller1@usa.doj.gov>; John Pierce <jpierce@johnpiercelaw.com>
Cc: Roger Roots <rroots@johnpiercelaw.com>; McCauley, Sean (USADC) <SMcCauley@usa.doj.gov>; Rummens, Brianna (USADC) [Contractor] <BRummens@usa.doj.gov>
Subject: [EXTERNAL] RE: 1:21-cr-00552-DLF USA v. THOMAS: Govt Preliminary Exhibit List

Hi Samantha, thanks for your patience. Here is the preliminary exhibit list. Thank you in advance

Respectfully,
Em Lambert
Client Advocate
John Pierce Law
P: (662) 665-1061
21550 Oxnard Street
3rd Floor PMB #172
Woodland Hills, CA 91367



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From: [Miller, Samantha \(USADC\)](#)
Sent: Friday, April 28, 2023 11:37 AM
To: [John Pierce](#); [Emily Lambert](#)
Cc: [Roger Roots](#); [McCauley, Sean \(USADC\)](#); [Rummens, Brianna \(USADC\) \[Contractor\]](#)
Subject: RE: 1:21-cr-00552-DLF USA v. THOMAS: Govt Preliminary Exhibit List

Ok. Thank you.

—

Samantha R. Miller
Assistant United States Attorney
United States Attorney's Office | District of Columbia
Email: samantha.miller@usdoj.gov
Desk Tel: (202) 252-7014

From: John Pierce <jpierce@johnpiercelaw.com>
Sent: Friday, April 28, 2023 11:25 AM
To: Miller, Samantha (USADC) <SMiller1@usa.doj.gov>; Emily Lambert <elambert@johnpiercelaw.com>
Cc: Roger Roots <rroots@johnpiercelaw.com>; McCauley, Sean (USADC) <SMcCauley@usa.doj.gov>;
Rummens, Brianna (USADC) [Contractor] <BRummens@usa.doj.gov>
Subject: [EXTERNAL] RE: 1:21-cr-00552-DLF USA v. THOMAS: Govt Preliminary Exhibit List

Hi Samantha. Em says she should be able to get to you by tonight. Thx, John

From: Miller, Samantha (USADC) <Samantha.Miller@usdoj.gov>
Sent: Friday, April 28, 2023 10:57 AM
To: John Pierce <jpierce@johnpiercelaw.com>; Emily Lambert <elambert@johnpiercelaw.com>
Cc: Roger Roots <rroots@johnpiercelaw.com>; McCauley, Sean (USADC) <Sean.McCauley@usdoj.gov>;

Rummens, Brianna (USADC) [Contractor] <Brianna.Rummens@usdoj.gov>

Subject: RE: 1:21-cr-00552-DLF USA v. THOMAS: Govt Preliminary Exhibit List

John,

After internal discussion and further review of deadlines, because the pre-trial conference is a week from Monday, we do not anticipate Judge Friedrich taking too kindly to any extension requests, but certainly not any beyond next Friday, 5/5.

Therefore, we would like your exhibit list by end of day today, which will give us the weekend to review and, hopefully, avoid any need for an extension request. Once we have the list, we'll let you know whether we anticipate needing to request until 5/5 to submit our objections.

Please confirm.

Thank you,

Samantha

—

Samantha R. Miller
Assistant United States Attorney
United States Attorney's Office | District of Columbia
Email: samantha.miller@usdoj.gov
Desk Tel: (202) 252-7014

From: John Pierce <jpierce@johnpiercelaw.com>

Sent: Friday, April 28, 2023 8:12 AM

To: Miller, Samantha (USADC) <SMiller1@usa.doj.gov>; Emily Lambert <elambert@johnpiercelaw.com>

Cc: Roger Roots <rroots@johnpiercelaw.com>; McCauley, Sean (USADC) <SMcCauley@usa.doj.gov>;

Rummens, Brianna (USADC) [Contractor] <BRummens@usa.doj.gov>

Subject: [EXTERNAL] Re: 1:21-cr-00552-DLF USA v. THOMAS: Govt Preliminary Exhibit List

We would definitely not oppose additional time that you need Samantha. Thank you.

John

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From: Miller, Samantha (USADC) <Samantha.Miller@usdoj.gov>

Sent: Friday, April 28, 2023 8:08:12 AM

To: Emily Lambert <elambert@johnpiercelaw.com>

Cc: John Pierce <jpierce@johnpiercelaw.com>; Roger Roots <rroots@johnpiercelaw.com>; McCauley, Sean (USADC) <Sean.McCauley@usdoj.gov>; Rummens, Brianna (USADC) [Contractor]

<Brianna.Rummens@usdoj.gov>

Subject: RE: 1:21-cr-00552-DLF USA v. THOMAS: Govt Preliminary Exhibit List

Ms. Lambert, Good Morning,

The deadline of April 26, 2023 to exchange exhibit lists was court imposed, not imposed by the government. The scheduling order does not require the exhibits, themselves, to be turned over at that time. However, because we have not received your exhibit list yet, we may need to request additional time from the Court to file any objections to the list, given it was already a fairly tight turn-around for review and objections.

Thank you,

Samantha

—

Samantha R. Miller
Assistant United States Attorney
United States Attorney's Office | District of Columbia
Email: samantha.miller@usdoj.gov
Desk Tel: (202) 252-7014

From: Emily Lambert <elambert@johnpiercelaw.com>
Sent: Thursday, April 27, 2023 8:29 PM
To: Miller, Samantha (USADC) <SMiller1@usa.doj.gov>
Cc: John Pierce <jpierce@johnpiercelaw.com>; Roger Roots <rroots@johnpiercelaw.com>; McCauley, Sean (USADC) <SMcCauley@usa.doj.gov>; Rummens, Brianna (USADC) [Contractor] <BRummens@usa.doj.gov>
Subject: [EXTERNAL] Re: 1:21-cr-00552-DLF USA v. THOMAS: Govt Preliminary Exhibit List

Thank you Samantha. I am having a few computer issues tonight, would it be alright if I send our list and exhibits over to you tomorrow?

Thank You,
Em

On Apr 26, 2023, at 11:31 PM, Miller, Samantha (USADC) <Samantha.Miller@usdoj.gov> wrote:

John and Roger,

Pursuant to the Court's Scheduling Order (ECF No. 66), attached please find the Government's preliminary exhibit list.

Thank you,

Samantha

—

Samantha R. Miller
Assistant United States Attorney

United States Attorney's Office | District of Columbia
Email: samantha.miller@usdoj.gov
Desk Tel: (202) 252-7014