

EXHIBIT 2

Chandra Bussone

From: Sobelman, Robert (USANYS) <Robert.Sobelman@usdoj.gov>
Sent: Friday, November 12, 2021 3:59 PM
To: Paul Calli; Charles Short
Cc: Harlan Protass; Steiner, Mitzi (USANYS); Kelly, Jacqueline (USANYS) 2
Subject: RE: In re Search Warrant Dated November 5, 2021, Case No. 21-MAG-10685

Paul,

Our letter to the Court simply used the same language as the Court's order, it was not intended to mean anything different than we previously have discussed. Hopefully this addresses your concern: As we previously have confirmed, upon the filing of your motion, the Government paused the review of all material obtained from the search of your client's residence, regardless of when that material was extracted.

Thanks,

Rob

From: Paul Calli <pcalli@calli-law.com>
Sent: Friday, November 12, 2021 3:49 PM
To: Charles Short <cshort@calli-law.com>
Cc: Sobelman, Robert (USANYS) <RSobelman@usa.doj.gov>; Harlan Protass <hprotass@protasslaw.com>; Steiner, Mitzi (USANYS) <MSteiner@usa.doj.gov>; Kelly, Jacqueline (USANYS) 2 <JKelly2@usa.doj.gov>
Subject: [EXTERNAL] Re: In re Search Warrant Dated November 5, 2021, Case No. 21-MAG-10685

Rob,

Chas inadvertently posed the wrong question below.

Despite our request to do so, you never agreed to stop extraction of material from Mr. O'Keefe's devices, upon the filing of our motion.

You agreed only to our request to stop review of any material already extracted from Mr. O'Keefe's devices at the time we filed our motion (meaning no further review of material extracted PRIOR to the moment we filed our motion.)

Accordingly, because I noticed that you did not inform the Court of the foregoing, I request that you re affirm that the government suspended review of material upon the filing of our motion, that it had extracted prior to the filing thereof.

Sincerely,

Paul

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