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November 19, 2021

VIA ECF

Honorable Analisa Torres
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: In re Search Warrant Dated November 5, 2021, Case No. 21-MC-00813 (AT)

Dear Judge Torres:

Earlier today the government filed its Memorandum of Law in Opposition to Motions for Appointment of Special Master (the “Gov’t Mem.”) (Docket No. 29). In it, the government repeatedly asserts that the search warrant executed at the home of journalist James O’Keefe was “supported by detailed affidavits, and authorized by a federal magistrate judge, who found probable cause to believe that the subject premises and the devices therein contained evidence of federal crimes.” Gov’t Mem. at 2; *see also id.* at 1, 3, 4, 7, 12 and 14. The government even argued that those affidavits contain specific evidence demonstrating probable cause to believe that Project Veritas and Mr. O’Keefe were allegedly involved in unlawful conduct (theft of property and the interstate transportation of such property). *Id.* at 1.

By doing so, the government affirmatively puts the affidavits’ contents at issue. Moreover, our reply to the Gov’t Mem. necessarily requires knowledge of those contents. Without it, our reply to the Gov’t Mem.’s assertions concerning its affidavits amounts to shadowboxing.

We therefore request that this Court enter an Order directing the government to produce all affidavits that it submitted to any court in support of the search warrant it obtained for the search of James O’Keefe’s home.

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Respectfully submitted,

CALLI LAW, LLC

/s/

By: _____

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cc: All Counsel of Record (via ECF)