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November 12, 2021

BY EMAIL

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 3, 2021, 21 MAG 10547

Dear Judge Torres:

We represent Eric Cochran. On Wednesday, November 3, 2021, the Federal Bureau of Investigation (“FBI”) executed a search warrant at our client’s private residence in Mamaroneck, NY, seizing various electronic devices, items and materials. Mr. Cochran is a former journalist at Project Veritas; the items seized include materials that are subject to various protections, including but not limited to those provided by the First Amendment and the attorney-client privilege.

We understand that search warrants seeking similar materials were executed at the residences of another former Project Veritas journalist as well as its founder, James O’Keefe. By letter dated November 10, 2021, counsel for Mr. O’Keefe and Project Veritas applied to this court seeking certain relief in connection with the search warrant executed on Mr. O’Keefe’s residence. By order dated November 11, 2021 (a copy of which is attached) this Court set a briefing schedule and directed that the Government confirm that it has paused extraction and review of the materials seized from Mr. O’Keefe. The Government advised today that it would pause extraction and review of the materials seized from Mr. Cochran pending resolution of the application. It also advised that it had requested an extension of time within which to respond to the application filed by Project Veritas and Mr. O’Keefe; Mr. Cochran takes no position with respect to that request.

We respectfully join the application of Mr. O’Keefe and Project Veritas, request the same relief as to Mr. Cochran, and request that the Court’s Order dated November 11, 2021 apply to Mr. Cochran as well.

Respectfully submitted,

/s/ Adam Hoffinger

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Attorney for Eric Cochran



cc: AUSA Robert Sobelman
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Attachment

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Search Warrant dated November 5, 2021,

21 MAG 10685 (AT)

ORDER

ANALISA TORRES, District Judge:

The Court has reviewed Petitioners' motion for appointment of a special master dated November 10, 2021. Accordingly,

1. By **November 12, 2021**, the Government shall confirm via email that it has paused its extraction and review of the contents of Petitioner O'Keefe's phones;
2. By **November 16, 2021**, the Government shall provide the Court with its response to Petitioners' motion;
3. By **November 19, 2021**, Petitioners shall provide the Court with their reply, if any.

SO ORDERED.

Dated: November 11, 2021
New York, New York



ANALISA TORRES
United States District Judge