## The Dickerson Law Group

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November 12, 2021

## **VIA EMAIL**

Original will not follow by mail.

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

Re: In re Search Warrants dated November 3, 2021, 21 MAG 10547

Dear Judge Torres:

This law firm represents Spencer Meads, a journalist who was formerly employed by the non-profit news organization Project Veritas. Mr. Meads was the subject of a search warrant for electronic devices that was executed by the FBI on November 4, 2021 in connection with the Government's criminal investigation relating to contents of a diary that was published by another news outlet over a year ago, and which purportedly belonged to Ashley Biden, daughter of then-candidate Joseph R. Biden.

Mr. Meads takes this opportunity to formally join in the pending Motion for Appointment of a Special Master filed on November 10, 2021 on behalf of Project Veritas and Mr. James O'Keefe (the "Motion"). Notably, Mr. Meads was employed by Project Veritas at all times material to the events underlying the Government's ongoing diary investigation. Accordingly, Mr. Meads' legal interests are impacted by the same First Amendment concerns and other legal issues argued in the pending Motion filed by Project Veritas and Mr. O'Keefe.

Additionally, I take this opportunity to advise the Court that during a phone call this morning with Assistant U.S. Attorneys for the Southern District of New York, the Government agreed to pause further extraction and review of electronically-stored information from devices belonging to Mr. Meads that were seized by the FBI pursuant to the search warrant directed against Mr. Meads, pending this Court's resolution of the Motion filed by Project Veritas and Mr. O'Keefe. Specifically, the undersigned and the Government agreed that upon this Court's ruling on the pending Motion, counsel will further confer regarding any disputed issues regarding how Mr. Meads' electronic devices should be processed.

## **The Dickerson Law Group**

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Respectfully submitted,

By:\_\_\_\_

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Application for Attorney Admission to the Southern District of New York to be filed promptly

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