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BY ECF & E-MAIL

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Cohen v. United States, No. 18-mj-3161 (KMW)

Dear Judge Wood:

On behalf of President Donald J. Trump, an Intervenor in this action, we write in response to the Court's Order of yesterday directing counsel to describe the resources available "for the expeditious production of non-privileged materials; the review of potentially privileged materials; the creation of privilege logs (if privilege logs are necessary); and providing a Special Master with any necessary information to make timely and accurate determinations as to privilege."

By separate letter, Mr. Cohen's counsel describes the process by which they will initially review the materials provided by the government to isolate the materials that relate to each of the privilege-holders, including the President, and the resources they will devote to that project. As necessary, our firm's attorneys will consult closely with Mr. Cohen's counsel to assist in identifying the seized materials that relate to the President.

To ensure an expeditious review of those materials created or received by Mr. Cohen in the course of his providing legal representation to the President, we are engaging a preeminent forensic e-discovery and legal technology solutions vendor. That vendor, which has offices throughout the world, including in New York, has broad experience assisting the largest law firms in the country with the management of complex, sensitive litigation matters requiring the efficient processing and review of large amounts of data. It has expertise in hosting secure data review platforms and assisting law firms in the performance of substantive and privilege reviews of data of varied provenance (for example, data extracted from computer hard drives, tablets, and smartphones).

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Separately, as needed, we will use a second vendor with whom we have a longstanding relationship to engage the services of experienced contract attorneys, selected by our law firm after careful review of their credentials, to assist in privilege review alongside, and under the close supervision of, Spears & Imes lawyers. We have substantial experience handling large, complex matters. When appropriate, we engage contract attorneys to assist with document review, including the review of documents for privilege. By way of example, in an enforcement investigation for which I am the responsible partner, we recently conducted a large document review on behalf of a financial services firm, under a compressed time frame, using a team of fifteen contract attorneys selected and supervised by Spears & Imes lawyers.

Our own associates, as well, are exceptionally well-qualified, hailing from the country's best law schools and having worked directly with the partners at our firm on complex, confidential government investigations, civil litigation, or both. Finally, our client will make himself available, as needed, to aid in our privilege review on his behalf.

We therefore anticipate drawing upon our attorneys and the vast resources of the vendors we are engaging specifically for this matter to review documents relating to the President and generate any privilege log for him warranted by that review. We expect to be able to proceed promptly and efficiently.

Respectfully submitted,

A handwritten signature in blue ink that reads "Joanna Hendon" followed by a stylized flourish or initials.

Joanna C. Hendon
Christopher W. Dysard
Reed M. Keefe

cc: All Counsel (by ECF)