

Exhibit B

From: [Latcovich, Simon](#)
To: [Halkbank](#); [Halkbank](#)
Subject: FW: United States v. Halkbank
Date: Monday, November 2, 2020 3:59:32 PM

Simon Latcovich

Williams & Connolly LLP

725 Twelfth Street, N.W., Washington, DC 20005

(P) 202-434-5967 | (F) 202-434-5029

slatcovich@wc.com | www.wc.com/slatcovich

From: Lockard, Michael (USANYS) <Michael.Lockard@usdoj.gov>

Sent: Monday, November 02, 2020 3:21 PM

To: Latcovich, Simon <SLatcovich@wc.com>; Kirkpatrick, James <JKirkpatrick@wc.com>; Desai, Damayanti <DDesai@wc.com>; Cary, Rob <RCary@wc.com>

Cc: Rebold, Jonathan (USANYS) <Jonathan.Rebold@usdoj.gov>; Kamaraju, Sidhardha (USANYS) <Sidhardha.Kamaraju@usdoj.gov>; Denton, David (USANYS) <David.Denton@usdoj.gov>; Fletcher, Kiersten (USANYS) 1 <Kiersten.Fletcher@usdoj.gov>

Subject: RE: United States v. Halkbank

Simon,

Your letter from Friday expresses concern that the Government has filed a motion pursuant to the Classified Information Procedures Act (“CIPA”). The Government has not filed a CIPA motion. On Friday, we filed a letter to “request[] a conference pursuant to Section 2 of the Classified Information Procedures Act,” to be held *ex parte* and under seal. Under Section 2 of CIPA, such conferences are appropriate to “consider matters relating to classified information that may arise in connection with the prosecution.” We have suggested that the defendant itself may wish to request such a conference at an appropriate time in order to discuss with the Court, among other things, the defendant’s theories of *Brady* as they may relate to any classified materials. As discussed on our call Thursday, Halkbank will receive notice of any motion the Government files pursuant to CIPA.

You also requested, in your letter dated October 28, 2020 and during the call on Thursday, the production of custodian information with respect to emails produced on the 2 terabyte hard drive and information corresponding to a “sort date” field. We have requested the custodian information so that it can be provided to you, and expect to receive it sometime this week. We have also been advised that information corresponding to “sort date” appears in the “EMAIL_SENT_DATE_TIME” or “EMAIL RECEIVED_DATE_TIME” fields. Please let us know if the data in those fields does not accomplish the purpose of the “sort date” information you requested.

Thanks,
Michael

From: Latcovich, Simon <SLatcovich@wc.com>
Sent: Friday, October 30, 2020 11:10 PM
To: Rebold, Jonathan (USANYS) <JRebold@usa.doj.gov>; Lockard, Michael (USANYS) <MLockard@usa.doj.gov>; Kamaraju, Sidhardha (USANYS) <SKamaraju@usa.doj.gov>; Denton, David (USANYS) <DDenton@usa.doj.gov>; Fletcher, Kiersten (USANYS) 1 <KFletcher1@usa.doj.gov>
Cc: Kirkpatrick, James <JKirkpatrick@wc.com>; Desai, Damayanti <DDesai@wc.com>; Cary, Rob <RCary@wc.com>
Subject: United States v. Halkbank

Counsel,

Please see the attached correspondence.

Best regards,
Simon

Simon Latcovich
Williams & Connolly LLP
725 Twelfth Street, N.W., Washington, DC 20005
(P) 202-434-5967 | (F) 202-434-5029
slatcovich@wc.com | www.wc.com/slatcovich

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