

From: Lee, Clarence Y.
Sent: Monday, May 09, 2016 1:37 PM
To: 'Seabrook, April (USADC)'
Cc: Hay, Thomas S.
Subject: FW: Second Interim Release for FOIA 16-00039

Hi April, I hope all is well. I am following up to this email from Tricia.

As you know, we identified certain areas where there were deficiencies in the search in the two emails below (April 19 and 28). For those districts, we believe those searches were inadequate.

Given the court's extension of time for the government to produce all documents, we are requesting the Agency to go back and re-run the searches with our suggested search terms (i.e. "JLN" or "JLN Solar") and especially with the name of the other suspect from the 1575 file. Without waiving any rights, we are willing to limit re-searches with those terms to Colorado, the New York, Texas, and California districts, main justice, and the District of Columbia and request that those terms – the ones we proposed and the other suspect - be used in searches not yet conducted.

Please let me know if the Agency will agree to this, which we think is reasonable to address the gaps in previous production.

Thanks,
Clarence

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