



U.S. Department of Justice

United States Attorney  
Southern District of New York

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The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

February 12, 2019

Via ECF

The Honorable Paul A. Crotty  
United States District Judge  
Southern District of New York  
United State Courthouse  
500 Pearl Street, Courtroom 14C  
New York, New York 10007

**Re: *United States v. Joshua Adam Schulte*, S2 17 Cr. 548 (PAC)**

Dear Judge Crotty:

The Government writes to update the Court concerning two of the discovery issues raised at the conference on February 5, 2019.

*First*, with respect to the defendant's access to discovery in prison, the Government has consulted with the MCC and understands that the hard drives containing the defendant's discovery were misplaced. As a result, the Government is providing another copy of the discovery to the defendant, which will be produced by tomorrow. In consultation with defense counsel, this reproduction will include all of the unclassified discovery produced to date except for a copy of the defendant's server, which requires a very large storage device for reproduction. The Government and defense counsel are working toward a solution for reproduction of the server.

*Second*, the Government confirms that it has produced an electronic copy of all classified discovery in this case. To the extent the defendant seeks unredacted copies of the classified discovery, the Government objects to that request for the reasons stated during the February 5 conference and in the Government's filing pursuant to Section 4 of the Classified Information Procedures Act, dated December 10, 2018.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

By: \_\_\_\_\_ /s/  
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Cc: Defense Counsel (via ECF)