

Yesterday's Whatsapp

Sent: Wednesday, October 16, 2019 5:36 PM

From: [REDACTED]

To: [REDACTED]

Patrick:

I looked at some of the screenshots you sent yesterday. Like most lawyers, I don't expect my communications with a witness to be hacked (least of all on Signal), but that said, not to worry. There is nothing that poses a problem for you. Or us.

We don't know what you are seeing that suggests that an FBI investigation of the kind you describe is underway, but for several reasons we don't think this is accurate. Please be sure to tread carefully. Whoever is putting this information on your plate is doing so for reasons that are not designed to help you, or us, or the government hold the bad guys accountable.

Some of the screenshots you sent include the hypothetical answers I gave you describing how, in general terms, cases might be settled. I recall typing that pretty fast, so I may not have been as clear as I should have been. Let me try again.

In order to have a settlement, we must first have a credible client with a good cause of action. We have a number of those, as you know since you first reached out to Brad. The evidence you described on your servers, if we had it, would potentially be of a big help, and we still hope to see it (or as much as you're willing to share). However, the still shots you showed us, taken from videos (which we have not seen), are questionable forensically. We would need to do more technical examination of them before determining their usefulness. That's one reason we had hoped to get more and better evidence.

If any evidence you give us holds up, settlements might occur along the lines of my message to you. That is, hypothetically speaking, we could notify counsel for the defendant of a lawsuit and discuss its merits, including whatever evidence we have in support of our claims. If that leads to a settlement, great. That is our job. If no settlement occurs, litigating is also part of our job. Other options that would need to be considered—depending on what we see—include notification to the FBI and prosecutors. You've also created what we'll call the "New York Times" option. But all of these steps have to remain hypothetical unless and until we get some good evidence in hand.

Let's get together here in New York next Wednesday and see if we can develop things further. A chicken parm is waiting for you at Fiorella's.

Stan

[REDACTED]