



U.S. Department of Justice

United States Attorney
Southern District of New York

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

May 25, 2018

BY ECF AND HAND

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Cohen v. United States*, 18 Mag. 3161 (KMW)

Dear Judge Wood:

As directed by Order dated May 22, 2018, the Government respectfully submits this letter—jointly with counsel for Michael Cohen, the Intervenors, and Stephanie Clifford—setting forth a proposed agenda for the conference on May 30, 2018. The parties request that the Court address the following at the conference:

- An update on the Government's production of the material seized pursuant to search warrant on April 9, 2018 to Cohen and the Special Master (the "Material").
- An update on Cohen's production of portions of the Material to the Intervenors.
- An update on the release of non-privileged portions of the Material to the Government by the Special Master.
- Clifford's counsel asks that the Court address his pending *pro hac vice* motion; Cohen asks that this motion be held in abeyance to the extent that Clifford's motion to intervene is also in abeyance.

- Clifford's counsel asks that the Court address his letter to the Court dated May 22, 2018 relating to alleged leaks of audio recordings by Mr. Cohen or members of his team.

Respectfully submitted,

ROBERT KHUZAMI
Attorney for the United States,
Acting Under Authority Conferred by
28 U.S.C. § 515

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