From: "Michael J. Avenatti" < mavenatti@eaganavenatti.com>

Date: June 24, 2018 at 9:39:04 PM EDT

To: "Roos, Nicolas (USANYS)" < Nicolas.Roos@usdoj.gov >

Cc: "Griswold, Andrea (USANYS)" < Andrea.Griswold@usdoj.gov >, "Maimin, Rachel (USANYS)"

< Rachel. Maimin@usdoj.gov >, "Thomas. McKay@usdoj.gov" < Thomas. McKay@usdoj.gov >, Ahmed Ibrahim

<aibrahim@eaganavenatti.com>

Subject: Re: In re Cohen - Production of Docs

Nick:

As a follow up to our call moments ago, I want to make our position clear:

- 1. We have gone to great lengths to accommodate this meeting (that your office requested) and we are prepared to proceed as scheduled tomorrow. The travel for this meeting has cost thousands of dollars and the fees associated with preparing for it have run in excess of \$20,000. My client and I have been extremely accommodating to your office in setting this meeting as you know.
- 2. We believe canceling the meeting because the press has now caught wind of it is ridiculous. We do not think it was any secret that at some point you were going to meet with my client. And the fact that cameras may be present outside of your office is of no moment. Further, this fact, while annoying, has no impact on the substance of the meeting, which should be the focus.
- 3. Your office has repeatedly stated that you want to proceed with the investigation as quickly as possible. If true, then you should proceed with the meeting, which has been scheduled for weeks.
- 4. As I suggested, we are more than happy to meet at an alternative location if you are that concerned about the press. I will secure a conference room at my hotel if you wish or we can meet in any other reasonable location of your choosing. We are entirely flexible in this regard.

In sum, we see no reason to cancel the meeting, which we understood was important to your investigation.

Best regards,

Michael