

Subject: RE: [EXTERNAL] Conferral Pursuant to Judge Tse's Instruction In 4:24-cv-06628-YGR Law v. Federal Bureau of Prisons
From: "Butland, Brodie (USACAE)" <Brodie.Butland@usdoj.gov>
Date: 5/22/25, 2:47 PM
To: Caitlin Henry <ckh@caitlinkellyhenry.com>, "Cziok, Abbie (USAMT)" <Abbie.Cziok@usdoj.gov>, "Mattioli, Madison (USAMT)" <Madison.Mattioli@usdoj.gov>, "Smith, Mark (USAMT)" <Mark.Smith3@usdoj.gov>, "Tatarka, Tim (USAMT)" <Tim.Tatarka@usdoj.gov>, "Boesch, Victoria (USACAE)" <Victoria.Boesch@usdoj.gov>, "Heathcotte, Brock (USAAZ)" <Brock.Heathcotte@usdoj.gov>
CC: "Pyle, Michael T. (USACAN)" <Michael.T.Pyle@usdoj.gov>

Hi Caitlin,

Because Madison and I are not part of the FOIA case and have not been specially appointed to participate in it, we do not feel it would be appropriate for us to attend the discovery hearing or otherwise participate directly in the case. We will, however, assist BOP with collecting documents if specific issues arise, and BOP and its FOIA counsel can make any productions as appropriate.

Best regards,
Brodie

From: Caitlin Henry <ckh@caitlinkellyhenry.com>
Sent: Saturday, May 17, 2025 11:25 AM
To: Butland, Brodie (USACAE) <Brodie.Butland@usdoj.gov>; Cziok, Abbie (USAMT) <Abbie.Cziok@usdoj.gov>; Mattioli, Madison (USAMT) <Madison.Mattioli@usdoj.gov>; Smith, Mark (USAMT) <Mark.Smith3@usdoj.gov>; Tatarka, Tim (USAMT) <Tim.Tatarka@usdoj.gov>; Boesch, Victoria (USACAE) <Victoria.Boesch@usdoj.gov>; Heathcotte, Brock (USAAZ) <Brock.Heathcotte@usdoj.gov>
Cc: Pyle, Michael T. (USACAN) <Michael.T.Pyle@usdoj.gov>
Subject: Re: [EXTERNAL] Conferral Pursuant to Judge Tse's Instruction In 4:24-cv-06628-YGR Law v. Federal Bureau of Prisons

Dear Brodie,

Thank you for your response. As you discuss your plan I also invite you to consider attending the Zoom discovery hearing on 1pm May 27, 2025.

<https://cand-uscourts.zoomgov.com/j/1607320709?pwd=aFE4TjJvUXFGSFFab1ltUUUVIY2ZtQT09>

Webinar ID: 160 732 0709
Password: 689600

Sincerely,

Caitlin

On 5/16/25 3:26 PM, Butland, Brodie (USACAE) wrote:

Good afternoon Caitlin,

Apologies for not responding until now. Madison and I are still trying to get some information needed to inform our plan relating to your FOIA requests. We hope to have everything sorted out in the first half of next week.

Best regards,
Brodie

Brodie M. Butland | Assistant United States Attorney | Eastern District of California

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From: Caitlin Henry <ckh@caitlinkellyhenry.com>

Sent: Tuesday, May 13, 2025 1:57 PM

To: Cziok, Abbie (USAMT) <Abbie.Cziok@usdoj.gov>; Mattioli, Madison (USAMT) <Madison.Mattioli@usdoj.gov>; Smith, Mark (USAMT) <Mark.Smith3@usdoj.gov>; Tatarka, Tim (USAMT) <Tim.Tatarka@usdoj.gov>; Boesch, Victoria (USACAE) <Victoria.Boesch@usdoj.gov>; Butland, Brodie (USACAE) <Brodie.Butland@usdoj.gov>; Heathcotte, Brock (USAAZ) <Brock.Heathcotte@usdoj.gov>

Cc: Pyle, Michael T. (USACAN) <Michael.T.Pyle@usdoj.gov>

Subject: [EXTERNAL] Conferral Pursuant to Judge Tse's Instruction In 4:24-cv-06628-YGR Law v. Federal Bureau of Prisons

Dear Counsel,

I write on behalf of my client, Victoria Law, Plaintiff in 4:24-cv-06628-YGR Law v. Federal Bureau of Prisons FOIA litigation for records pertaining to Dublin (found related to 22-cv-05137-YGR M.R. v. Federal Correctional Institution "FCI" Dublin).

In yesterday's May 12, 2025 Discovery Hearing, Judge Tse, Magistrate for discovery in this case (and the M.R. and CCWP cases) directed me to email counsel in CCWP and M.R.. The Honorable Judge Tse directed me to contact counsel directly because counsel in this FOIA case, Assistant United States Attorney Michael Pyle (cc'd), is conflicted out of the civil rights cases.

Judge Tse instructed me to ask you to explore the possibility of providing records from the CCWP and M.R. cases to Plaintiff Law. Judge Tse proposed that the DOJ could supply records in this manner as a means of satisfying BOP's obligations in the FOIA litigation.

In an effort to reduce the burden on BOP and accelerate the rate at which my client receives

responsive records, and avoid unnecessary use of the court's time and resources, I respectfully request that your office notify me no later than Friday, May 16, about whether it is amenable to reviewing the attached FOIA request and identifying any records that would be responsive to one or more subparts.

If such documents exist, I would ask that you share the volume and nature of such documents (by page, format, and general description), with me and BOP Senior Attorney Carpenter (kcarpenter@bop.gov) and FOIA Director Christenson (kchristenson@bop.gov), so that they can be efficiently reprocessed and released by BOP FOIA without the unnecessary expenditure of resources by the agency.

Ms. Law's is not requesting documents that were unsealed in her previous motion to intervene and unseal, unless there are unredacted version of any previously redacted releases. If desired, I could provide more information comparing what was unsealed to the items requested in the FOIA.

Please do not hesitate to contact me if it would be helpful to discuss this request by phone.

I will be noting your response in the Joint Status report due May 22, 2025 and in the further Zoom discovery hearing on 1pm May 27, 2025.

Sincerely,

Caitlin Kelly Henry, Esq.

Enc:

Minute Order from Hearing (ECF. No 36)

Items Requested By Plaintiff Law